Public Document Pack

Planning Applications Sub-Committee

Date: **TUESDAY, 11 FEBRUARY 2025**

Time: 9.00 am

Venue: **LIVERY HALL - GUILDHALL**

Members:

Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Ian Bishop-Laggett
Mary Durcan
Deputy John Edwards
Anthony David Fitzpatrick
Deputy John Fletcher
Deputy Marianne Fredericks
Jaspreet Hodgson
Amy Horscroft
Alderman Robert Hughes-Penney
Alderwoman Elizabeth Anne King, BEM JP
Deputy Natasha Maria Cabrera Lloyd-Owen
Charles Edward Lord, OBE JP
Antony Manchester
Deputy Brian Mooney BEM
Deputy Alastair Moss
Eamonn Mullally
Alderwoman Jennette Newman
Deborah Oliver
Judith Pleasance
Deputy Henry Pollard
Alderman Simon Pryke
Ian Seaton
Hugh Selka
Tom Sleigh
Luis Felipe Tilleria
Shailendra Kumar Kantilal Umradia
William Upton KC
Jacqui Webster
Deputy Dawn Wright

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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.

1. **APOLOGIES**

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

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

   Report of the Director of Planning & Development.

   For Decision
   (Pages 5 - 1884)

4. **XL HOUSE, 70 GRACECHURCH STREET, LONDON, EC3V 0HR**

   Report of the Director of Planning & Development.

   For Decision
   (Pages 1885 - 2294)

5. **RIVER FORESHORE ADJACENT TO RIVERBANK HOUSE SWAN LANE EC4R 3BF**

   Report of the Director of Planning & Development.

   For Decision
   (Pages 2295 - 2418)

6. *** VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

   Report of the Chief Planning Officer & Development Director.

   For Information

7. *** DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

   Report of the Chief Planning Officer & Development Director.

   For Information

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

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

Committee	**Date:**
Planning Applications Sub-Committee	11 February 2025
Subject: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR 24/00021/FULEIA: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. 24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.	**Public**
Ward: Aldgate	**For Decision**
Registered No: 24/00021/FULEIA and 24/00011/LBC	**Registered on: 11 March 2024**

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

Summary

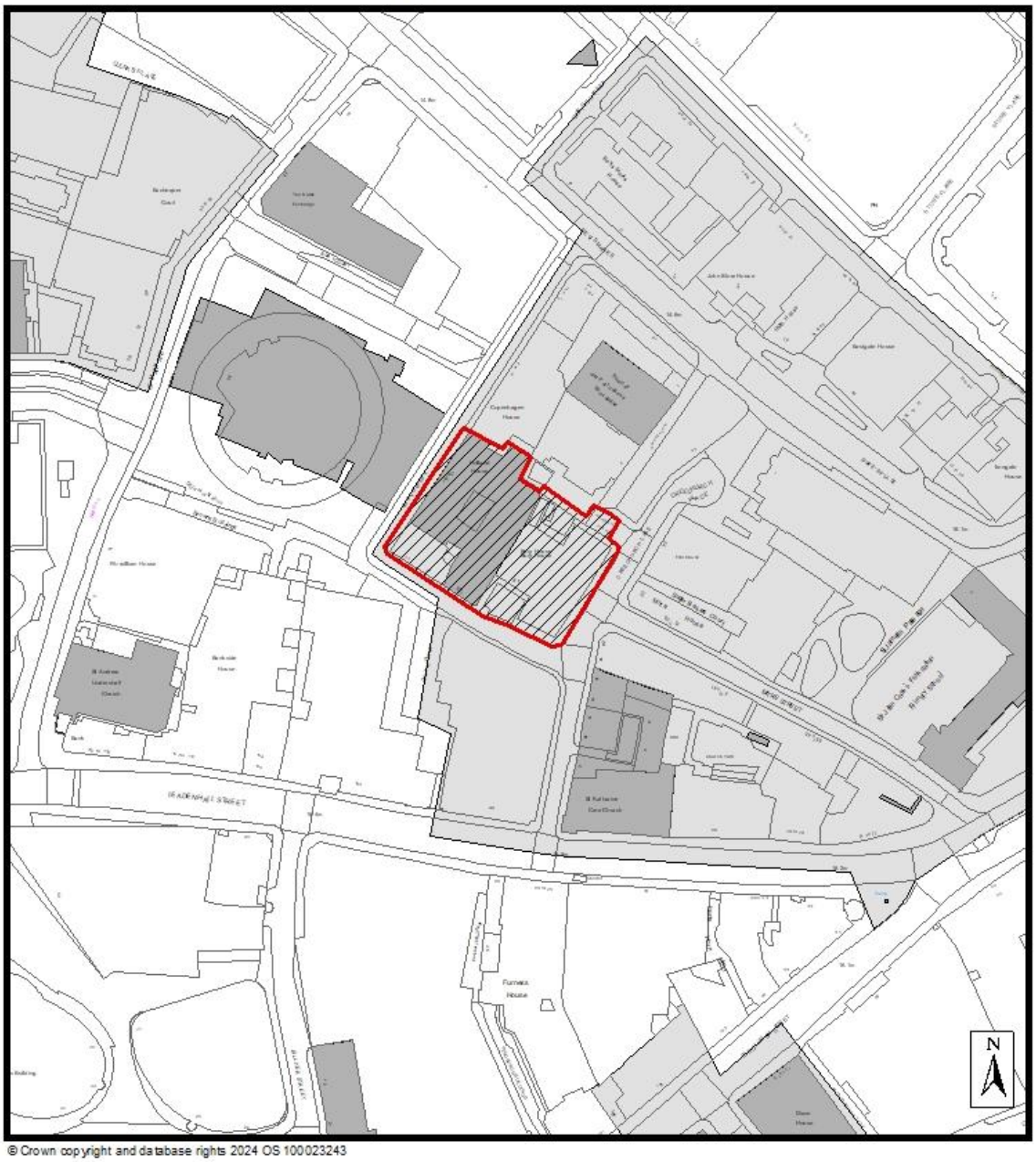
An EIA application (24/00024/FULEIA) proposing an office-led development through the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension at Holland House and three storey extension at Renown House and interconnection of the three buildings, was previously presented at Committee on the 13th December 2024 with a recommendation to approve the application.

An associated Listed Building Consent (24/00011/LBC) application relating to the restoration works Holland House, partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension, was also presented at the same committee meeting with a recommendation to grant listed building consent.

At the committee meeting, Members took a different view to that of officers and resolved not to grant planning permission and listed building consent, with precise Reasons for Refusal to be formulated by officers and returned to Members for endorsement. Accordingly, this report recommends Reasons for Refusal to reflect the Committee's resolution on of 13 December 2024.

Site Location Plan

Site Location Application Plan



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ADDRESS:
1-4, 31-34 Bury Street

CASE No.
24/00021/FULEIA

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Main Report

Background of the applications

1. On 13 December 2024 the Planning Applications Sub-Committee considered the applications for planning permission (reference: 24/00021/FULEIA) and listed building consent (reference: 24/00011/LBC). The Committee resolved, by 14 votes to 8, to refuse planning permission (subject to the Mayor of London being given 14 days to decide whether to allow the City to determine the application) and instructed officers to report back to Committee regarding the Reasons for Refusal. This report proposes the Reasons for Refusal for both the planning permission and listed building consent, in accordance with the committee instructions.

Considerations based on the debate of the Committee of 13 December 2024

2. During the debate, Members of the Committee explained their views in relation to the applications. Some Members considered the development unacceptable, and they expressed their views regarding the reasons the applications should be refused. It is noted that the Minutes of the meeting are appended as part of this report for reasons of clarity and transparency.

3. A number of concerns were raised by Members. Based on a close reading and consideration of the Minutes, officers consider that the concerns that reflected the opinion of the majority of the Committee and which therefore constitute the reasons for refusal are as follows:

    - The overbearing and overshadowing impact of the development on the courtyard of the Synagogue.
    - The loss of daylight and sunlight within the Bevis Marks Synagogue.
    - The reduced ability to view the moon in the night sky from the Bevis Marks Synagogue courtyard.

4. The above-mentioned impacts were considered by Members of the Committee to adversely affect the setting of the Grade I listed Bevis Marks Synagogue, the ability to appreciate its architectural character and the ability of worshippers to practice their religion in faith.

5. Some other matters were raised by some Members of the Committee; however, these were not echoed by the majority of Members or appeared to be the subject of any consensus; and therefore, officers consider that they should not constitute Reasons for Refusal. These included the following:

    - Failure to preserve the character and appearance of the Creechurch Conservation Area.

- Adverse impact on the setting and Outstanding Universal Value (OUV)of the Tower of London World Heritage Site as experienced in LVMF view 10A.1 from the North Bastion of Tower Bridge.
- Failure to preserve the special architecture and historic interest of Holland House Grade II* listed building, by reason of the massing, height and bulk of the proposed extensions.

6. Following the Committee's decision on the Reasons for Refusal, the Mayor of London will be notified. The Mayor of London will then have 14 days to notify the City whether he is content for the City to determine the application in accordance with the proposed refusal. If no notification is received from the Mayor of London within 14 days, the decision notice may be issued by the City.

Consultations

7. Although no re-consultation has been carried out following the Committee Meeting on the 13th December 2024, an additional letter of support has been received. Furthermore, two consultee responses from Hackney Council, raising no objections and Lambeth Council, raising no comments, have been received. The representation and consultation responses do not change the initial officer recommendation to approve the applications, which remains unaltered.

Conclusion

8. Following the Committee's decision of 13 December 2024 to overturn the officer recommendation to approve the proposed development at Bury House 1 - 4, 31 - 34 Bury Street, officers have reviewed the reasons given by Members of the Committee and recommended the Reasons for Refusal set out in the Recommendation section to reflect those reasons on which there was consensus amongst members who did not support the application. The listed building consent is also recommended for refusal for the reason set out in the Recommendation section below.

Background papers

- Report and background papers of the Planning Applications Sub-Committee of the 13 December 2024 relevant to applications 24/00021/FULEIA and 24/00011/LBC.
- Minutes of the of the Planning Applications Sub-Committee of the 13 December 2024.

RECOMMENDATION for application reference 24/00021/FULEIA

The matters raised during the debate at the Committee meeting of 13 December 2024 have been taken in consideration and in the context of the relevant Development Plan policies and the officer recommendation to grant planning permission remained unaltered.

However, Members of the Planning Applications Sub-Committee of 13 December 2024 decided to refuse the application and therefore, the following Reasons for Refusal are recommended (subject to notification to the Mayor of London and the Mayor of London being content for the City to determine the application):

1. The development would, by reason its overbearing and overshadowing impact on the courtyard of the Synagogue, result in less than substantial harm to the setting and significance of the Grade I listed Bevis Marks Synagogue. The harm would not be outweighed by the public benefits. The development would be unacceptable and contrary to Local Plan Policies CS 12, DM 12.1, DM 12.3; Emerging City Plan Policies S11 and DE7; London Plan Policy D9 C (1; d) and HC1 and the National Planning Policy Framework.
2. The development would, by reason of the loss of daylight and sunlight within the Bevis Marks Synagogue, adversely affect the ability of worshippers to carry out religious traditions and practices and manifest their religion in worship, being as such unacceptable and contrary to Local Plan Policy CS10 (1); Emerging City Plan Policies DE7 and the National Planning Policy Framework.
3. The development would, by reason of its position, height and massing, reduce the ability to view the moon in the night sky from the Bevis Marks Synagogue courtyard to the detriment of the ability of the worshippers to carry out important religious traditions and practices and manifest their religion in worship, contrary to Local Plan Policy CS10 (1); Emerging City Plan Policy HL1; London Plan Policy GG1 and the National Planning Policy Framework.

RECOMMENDATION for application reference 24/00011/LBC

The matters raised during the debate at the Committee meeting of 13 December 2024 have been taken in consideration and in the context of the relevant Development Plan policies and the officer recommendation to grant planning permission remained unaltered.

However, Members of the Planning Applications Sub-Committee of 13 December 2024 decided to refuse the application and therefore, the following reasons for refusal are recommended:

1. The proposed development at Holland House, by reason of its inability to be carried out in the absence of an approved planning permission of the associated development as proposed under the terms of application 24/00021/FULEIA, would result in an incomplete and unsatisfactory appearance of the listed building, which would fail to preserve the special architectural and historic interest of and result in harm to the Grade II* listed building. The harm would not be outweighed by public benefits. The development would be unacceptable and contrary to Local Plan Policies CS 12, DM 12.1, DM 12.3; Emerging City Plan Policies S11; London Plan Policy HC1 and the National Planning Policy Framework.

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PLANNING APPLICATIONS SUB-COMMITTEE
Friday, 13 December 2024

Minutes of the meeting of the Planning Applications Sub-Committee held at Livery Hall - Guildhall on Friday, 13 December 2024 at 10.00 am

Present

Members:
Deputy Shravan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Deputy Randall Anderson
Mary Durcan
Deputy John Edwards
Anthony David Fitzpatrick
Deputy John Fletcher
Deputy Marianne Fredericks
Jaspreet Hodgson
Amy Horscroft
Alderman Robert Hughes-Penney
Alderwoman Elizabeth Anne King, BEM JP
Deputy Natasha Maria Cabrera Lloyd-Owen
Antony Manchester
Deputy Brian Mooney BEM
Eamonn Mullally
Alderwoman Jennette Newman
Deborah Oliver
Deputy Henry Pollard
Ian Seaton
Hugh Selka
Tom Sleigh
William Upton KC
Jacqui Webster

Officers:

Fleur Francis	-	Comptroller and City Solicitor's Department
Gemma Delves	-	Environment Department
Rob McNicol	-	Environment Department
Gwyn Richards	-	Planning and Development Director
Tom Nancollas	-	Environment Department
Katie Stewart	-	Executive Director, Environment Department
Anna Tastsoglou	-	Environment Department
Polly Dunn	-	Assistant Town Clerk
Callum Southern	-	Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Ian Bishop-Laggett, Deputy Edward Lord, Judith Pleasance, Alderman Simon Pryke, Shailendra Umradia and Deputy Dawn Wright.

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

At Deputy Lord's request the following statement was read out by the Town Clerk.

"Having reviewed the papers for this Friday's meeting of PASC and taken independent professional advice, I understand that I continue to have a disclosable pecuniary interest in item 3, 1 Undershaft, due to a potential commercial relationship between the developer and the Leathersellers' Company, of which I am a member.

I will therefore not be present for that item.

As to item 4, Bury House, it is likely due to a duty as Deputy Governor of the Honourable the Irish Society, which is hosting the Freedom of the City for Lady Mary Peters LG DBE OLY, that I would be unable to remain for the full debate.

As a consequence, I must tender my apologies for absence for the whole meeting"

Deputy Lord was therefore not in attendance.

Jacqui Webster had also flagged the following:

"The Leathersellers Company have an interest in Agenda Item 1.

My organisation benefits financially from and has a relationship with the Leathersellers Company.

I sought brief advice for the July meeting.

However, further funding has been granted, and the relationship has deepened and in line with a review with my trustees this morning, the new Charity Governance Code and my organisation's declaration requirements, I am declaring an interest in agenda item 1."

Anthony Fitzpatrick declared that he would not be taking place in the vote on Item 3 – 1 Undershaft as when the plan was originally brought, the Alderman and Common Councillors for the ward of Lime Street had actively engaged in a round table that was hosted at Lloyds of London in February 2024. The Alderman and councillors had relayed the sentiments of businesses and individual votes and had a number of meetings with Eric Parry and the developers at Stanhope and had addresses a meeting of the ward club to present the new proposals. He now considered it inappropriate to take part in the debate and vote on this item and would therefore not do so.

Alistair Moss declared that he had a professional conflict with items 4 and 5 and would leave the room for those items.

Jaspreet Hodgson declared a non-pecuniary interest in Item 3 as it mentioned the Port of London Authority and informed she was a Member of the Ten Trinity Square Private Members' Club.

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

The Sub-Committee received a report which sought Planning Permission for the demolition of existing buildings at 1 Undershaft, the retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use; retail, food and beverage, public amenity space, publicly accessible education space and a viewing gallery at levels 72 and 73, public cycle hub, plus podium garden at level 11, the installation of a digital screen, public realm improvement works ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

The Chairman invited Officers to make a presentation to the Sub-Committee.

Officers presented the existing site plan to the Sub-Committee and stated that the application included a 28-storey vacant office tower, an area of space known as St Helen's Square and Undershaft. The development was bounded to the north by St. Helen's Bishopsgate, to the east by St. Mary Axe, to the west by the 'Cheese Grater' and to the south by Leadenhall Street.

Officers highlighted that Members deferred the scheme in July 2024 and had asked the applicant to look at making minor adjustments to the proposal in relation to the ground floor public realm. Officers stated that the applicant had since revised the lower levels of the building and an updated proposal was before the Sub-Committee.

Officers recapped on the details of the existing site and noted there were a number of heritage assets in the vicinity, notably St. Helen's Bishopsgate to the north, St. Andrew Undershaft to the east, the Lloyds Building to the south which were shown in purple on the presentation. Officers stated that a thin sliver of the north of the site was within the St Helen's Place Conservation Area and the site was within the City Cluster. The Officer presented an image of the Eastern / City Cluster policy area in the adopted and emerging Local Plans and explained this was an area of the City that had to work hard to accommodate growth to ensure that economic objectives and competitiveness were maintained. Officers further stated that the are wawas appropriate for tall buildings and the application site was represented by a red dot on the presentation and was broadly at the heart of the Cluster.

Officers presented an image of the aerial view of the existing site and stated it was a 1960s tower that was remodelled in the 1990s and was now subject to a certificate of immunity from listing. Officers noted the site did have an extant

consent for a new officer tower that was granted in 2019, and the 2019 scheme had recently been technically implemented through some demolition works on the site for context. Officers explained that the consented tower was 73 storeys at a height of 304.94m AOD and the proposed for consideration today was 74 storeys and 309.6m AOD.

Officers presented an image of the existing building from street level with a view of the front of the building and St. Helen's Square.

The Sub-Committee was also shown an image of the existing site from the west side of the building by Officers who described the area as an underutilised space dominated by bollards, railings and a ventilation shaft, as well as the Undershaft carriageway. Officers also presented a view of the existing site looking east along Undershaft toward the Gherkin and another view looking south along St. Mary Axe where Officers noted one could see the Lloyds Building in the background and the application site in the foreground. Officers also presented an image of the existing site looking west along Undershaft where Officers stated one could see the entrance to the servicing ramp for the existing building which was quite unsympathetic to the setting of the church.

Officers presented an aerial view of the proposed scheme and stated that the existing tower would be demolished and replaced with a 73-storey office tower that would deliver 153.602sqm of Grade A office floor space and supported 8,759 jobs. Officers told the Sub-Committee that the proposal was strategically significant to ensure the City maintained its economic competitiveness and would deliver, alongside the office space, complimentary public spaces, including the tallest viewing gallery at level 73, a high-level education space referred to as the classrooms in the sky at level 72, a restaurant at level 2, food and beverage offers at level 11, cultural spaces and a level 11 podium garden.

Officers stated that St. Helen's Square and the surrounding public realm would be transformed and the scheme would optimise the most strategic site in the Cluster.

An overview of how the massing of the building had changed since July 2024 was given by Officers who showed the Sub-Committee an image of the original scheme changes presented in 2024 and the revised building outline to the Sub-Committee. Officers noted that the focus had been on the lower levels of the building only and the upper levels would remain as previously proposed and highlighted that the green line represented the building outline proposed in July and could be seen in relation to the new outline from ground floor to level 3. Officers informed the Sub-Committee that the building would be set back by 10m which allowed more of St. Helen's Square to remain as public realm than previous proposed and there would be a reconfiguration of the building at level 11 which resulted in it coming further south by 7m.

Officers presented an image of the existing basement 3 and the proposed basement 3 and stated the existing basements would be retained, extended and reconfigured. Officers also presented an image of the existing and proposed basement 2 which accommodated policy compliant levels of long-

stay cycle parking and end of trip facilities. An image of the existing and proposed basement 1 was also presented by Officers who stated it would include a publicly accessible short-stay cycle hub that had been proposed in green and, as part of recent revisions to the scheme, a further area of basement would be extended as was shown in the blue outline.

The existing and proposed ground floor plan image was presented to the Sub-Committee by Officers who told the Sub-Committee that the proposed footprint would be bigger than the existing floor plan as it needed to work hard to deliver the necessary facilities to serve a building of the proposed size. Officers presented the original scheme changes from July 2024 and the revised building outline on the ground floor level which Officers stated clearly showed how the footprint of the building had changed with the 10m set back at the southern end and the massing redistributed to the west. Officers also presented an image of the ground floor amendments and stated that the previously proposed triple height lobby that would take people up to the level 11 podium garden was no longer proposed to allow the building line to be pushed back and office space would continue to be on the east side of the building, as was shown in yellow on the image, as well as an office reception, and a Changing Places toilet was proposed, as was shown in blue on the image. Officers stated that parking access would now be on the northwest corner of the building, as was shown on the image in pink, and the building would continue to be serviced from a new entrance at St. Mary Axe. Officers informed that enhancements were proposed to the public realm which surrounded the site. An image of the proposed ground floor entrances was also shown to the Sub-Committee by Officers who stated that it showed how the floor space reconfiguration would change the proposed entrance arrangements, and a single consolidated public entrance point was now proposed on the southwest side of the building. Officers told the Sub-Committee that users would take the lift or stairs to a new public lobby at level 1. From there, they would travel to the public spaces within the building and the revised positioning of the cycle parking entrance meant that cyclists did not have to pass through the public realm with their bikes.

Officers presented an image of the level 1 floor amendments and stated that a new public lobby was proposed that would accommodate space for the necessary lifting and security arrangements to allow people to access the public uses in the building.

An image of the proposed public podium floors at level 2 and level 3 were shown to the Sub-Committee by Officers who explained that, as part of the revision, the cultural and restaurant space had moved to levels 2 and 3 as, in previous proposals, levels 2 and 3 were office space and the culture and restaurant space was located at levels 9 and 10. Officers further stated that the positioning of those uses had been revised in order to better activate the lower levels of the building and make the public uses more visible from the surrounding public realm.

The Sub-Committee was presented with an image of the existing typical office floor plan and the proposed typical office floor plans for Zone 1 (levels 4-9) and Zone 2 (levels 14-29) by Officers who stated that it reflected how the building

form changed as it elevated. Officers also told the Sub-Committee that the office space would be suitable for a range of occupiers and an element of affordable workspace was proposed on the lower levels of the building. Officers further stated that the proposed office space would be befitting for the central cluster location and, in line with market demand and post COVID requirements, the office space would be complemented by generously sized and planted amenity terraces for the office occupiers. Officers presented the Sub-Committee with a CGI image of one of the proposed terraces.

Officers presented an image of the existing and proposed east elevation on to St. Mary Axe to the Sub-Committee and stated that the elevation images would show how the development would optimise the site through uplifting floor space and the increase and in height and massing would result in some daylight and sunlight impacts to nearby sensitive receptors. Officers considered this acceptable given the site context. Officers also presented the existing and proposed south elevation onto Leadenhall Street, the existing and proposed west elevation which faced the cheese grater, and the existing and proposed north elevation which faced onto Undershaft. Officers showed the Sub-Committee an image of the existing and proposed cross-section and stated one could see the public uses woven into the office space.

Officers stated to the Sub-Committee that the building would be contextual and would bring a series of interesting architectural approaches and high-quality design to the cluster which would range from the pale faience elevations which fanned out from the base to the podium garden which was shown to the Sub-Committee. Officers noted it would be suspended 42m above ground level and highlighted the zinc and enamel cladding of the main office tower. Officers further stated that it would be sustainable and would optimise circular economy principles through the reuse of the existing basement, the incorporation of facades optimised for shading, and it would be fully electric.

An image of the proposed crown of the building was presented to the Sub-Committee and Officers stated that the crown of the building would be picked out in subtle colour to reflect the civic functions of the top of the building and would form the apex to the cluster.

A presentation of the Tower of London from the existing and cumulative strategic view of LVMF 10A.1 was shown and Officers stated the development would have a striking and understated presence. Officers also presented a view of the cumulative development from Inner Ward in the Tower of London and told the Sub-Committee the development would be seen as essential to the modern skyline of the cluster and distinct and disassociated from the World Heritage Site.

Images of the existing and cumulative strategic view of Queen's Walk (LVMF 25A.1) were shown to the Sub-Committee. Officers told the Sub-Committee that the building would be the apex of the cluster with other towers descending from it.

Officers presented images of the previously proposed public spaces and cultural offer and the proposed public spaces and cultural offer and noted that more of the public uses would now be located at the lower levels of the building. Officers also presented an image of the public amenity floors and explained that the Museum of London education space would be a classroom in the sky at level 72 and, with the viewing gallery at level 73, both would be accessed from level 1 via the public lobby. Officers also presented images of the spaces in plan form and the classroom in the sky concept. They explained that the space would be curated by the Museum of London and would be a space where children could visit and learn about the City. Officers also stated that the Museum of London activity on the site would be complementary to that of its Smithfield site.

An image of the viewing galley was presented to the Sub-Committee and Offices stated it would offer different views to other viewing platforms in the City.

Officers presented an image and diagram of the level 11 podium garden and told the Sub-Committee it would be a significant architectural achievement and would be a generous, unparalleled public space that offered different views. They also noted it would be generously planted and have good microclimatic conditions. Images of the previously proposed, in July 2024, and proposed level 11 podium garden were shown to the Sub-Committee by Officers who explained that the floor space had been reconfigured while it still provided food and beverages and cultural and public spaces to complement its function. Officers further stated that as the public entrance point at ground level had changed, the arrival point on the podium had also changed, with people arriving on the west side of the terrace instead of the southern end. They also noted it was also proposed that the southern end would be a winter garden, that the public could use, which would increase the year-round appeal of the space.

Another image of the level 11 podium garden was shown to the Sub-Committee and Officers stated a feature of the podium garden would be the oculus, a circular area of walkway on structural glazing which would give views to ground level 42m below.

A diagram of the continuous city public realm was presented to the Sub-Committee by Officers who explained that the public realm would be enhanced and the north-south and east-west walking routes highlighted would be optimised and designs for St. Helen’s Square had been revised since July 2024. Officers stated that the revised proposal created Undershaft Square to the west of the building.

Officers also stated that the proposals included an extensive Section 278 agreement for the whole of St. Mary Axe and part of Leadenhall Street to the south which would be transformational and could include the rebuilding of the footway and carriageway to seek to improve the pedestrian environment. Officers also explained it presented an opportunity to remedy some issues on the street through a redesign and the street would be built in the City of London technical pallet of materials which would harmonise with the look of the

adjacent streets and public spaces. An image of St. Mary Axe of the proposed Section 278 works was shown by Officers to the Sub-Committee.

In reference to the ground level experience of the scheme, Officers presented a view of the existing and proposed building from Lime Street looking north and stated that one could see the introduction of a new screen and the podium of the oculus. Officers also showed an image of the existing and proposed building from Lime Street looking north from a closer angle and Officers noted that one could see the proposed base of the building in the proposed version which fanned out with the podium garden above.

Officers also presented images of the existing western public space, the proposed space in July 2024 and the proposed space for December 2024. They stated the area had been worked up in more detail and would become Undershaft Square with further landscaping and greening.

Images of St. Helen's Churchyard as it existed and as proposed were presented to the Sub-Committee and Officers stated there would a clear view to the public uses of the lower levels of the building.

An image of the existing and proposed views along St. Mary Axe were shown to the Sub-Committee.

Viewpoints of the existing servicing area view and the proposed view from Undershaft looking west were presented to the Sub-Committee by Officers who highlighted the carriageway moving northwards in the proposed view and the removal of the existing servicing entrance. Officers explained that, as shown in the image, servicing would take place from the corner of Undershaft and St. Mary Axe and deliveries would be consolidated and off-peak with final details being secured by a delivery and servicing management plan.

Officers presented the proposed cycle access and noted the cycle parking entrance would be at the western end of Undershaft.

Existing and proposed views across St. Helen's Square looking toward St. Andrew Undershaft were presented to the Sub-Committee by Officers who stated that the proposals would create a new civic space in the heart of the cluster. The existing steps, level changes, hard edges and planters shown in the existing image were to be removed and Officers further stated that the new space would be simplified completely at grade to make it more accessible and inclusive. Officers noted it would have a grove of trees and new seating.

The existing and proposed ground floor plan which showed the public space around the building was presented to the Sub-Committee by Officers who informed that the footprint of the proposed building would be bigger than as it existed as it worked hard to deliver what was required to make the building of the proposed size function. As a result, there would be some loss of St. Helen's Square. Officers showed diagrams of the existing square per mile area of St. Helen's Square, the proposal of July 2024 and the current proposal to the Sub-Committee and explained that the amount of the square that would be lost

would be smaller than that proposed in July 2024 as the southern edge of the building had been pulled back by 10m. Officers further stated, while they presented a diagram of the square per mile of the public realm at the podium garden, that when both the podium level garden and the ground level space was taken as a whole, the scheme would overall delivered an uplift in the quality and quantity of the public space.

Officers presented an image of the previously proposed scheme in July 2024 and the proposed St. Helen's Square and stated the existing level changes would be removed and more usable space would be created for trees and seating. Officers also told the Sub-Committee that the screen would activate the public realm and could be used to show art displays and sporting events and informed Members that the content of the screen would be controlled through a Section 106 agreement.

An image of the revised proposed new public entrance off St. Helen's Square was shown to the Sub-Committee by Officers who told Members it would be clearly defined with colour to match the way that the colour was used at the top of the building to denote civic use.

A visual of the proposed level 1 lift portal, which would be located off St. Helen's Square, adjacent to the main stairs, was also shown to Members by Officers who stated it was clearly defined in red.

Officers displayed another visual of the proposed St. Helen's Square viewed from Leadenhall Street.

Another visual of the proposed St. Helen's Square was shown by Officers who stated that it was the Undershaft square and would form part of the route between St. Helen's Square and Undershaft and further stated that one could see the relationship between the public uses within the building and the public realms.

Officers summarised that the proposed scheme delivered over 153,000 square metres of flexible, Grade A, best in class office floor space, which accommodated up to circa 8,759 jobs and it would be a significant strategic contribution of office floor of the utmost importance to the City's economic objectives to maintain its international competitiveness, as well as strengthening the economic base of the City Cluster. Officers further noted that it would be a scheme with the highest social and educational values and credentials and would deliver the highest elevated public cultural space and classroom space in Britain. Officers stated that the space would be curated by the London Museum at the apex of the City Cluster of tall buildings and would be free to visit and inclusive. They also stated that the proposals delivered a striking free to visit new public space in the form of a podium garden which was an unparalleled new elevated public space and created an iconic new destination at the heart of the cluster which would support the City's cultural 7 day and evening objectives. Officers further stated the proposal would be the totemic centrepiece and backbone of the cluster and would be an outstanding architectural moment at the heart of the City. Officers told the Sub-Committee

that the scheme would carry exemplary sustainability credentials, targeted a BREEAM 'Outstanding' rating and was designed with circular economy principles to address climate adaptation and mitigation. Officers also stated the scheme would provide significant improvements at ground floor level which included the transformation of Undershaft and St. Mary Axe and noted that there would be a reduction in the extent of the ground floor public realm as a result of necessary facilities needed to service a building of key strategic importance to the City to deliver the office floor space it needed. However, Officers stated that the new reimagined ground floor public realm would provide a significantly more enhanced, inclusive and flexible St. Helen's Square in quality terms and a reimagined public space at the heart of the cluster. Officers told the Sub-Committee that it was the single most strategic site in the cluster and the City and it was vital that optimised floor space capacity was sought on the site to remain internationally competitive in the years ahead. Officers noted the need to balance that with the provision of high-quality public realm and other planning considerations. Officers stated they firmly believed that the scheme achieved the balance and recommended approval of the proposals to the Sub-Committee.

The Chairman informed the Sub-Committee that there were no Objectors to the application and invited the Supporters to address the Sub-Committee.

The Town Clerk explained to speakers that they would have a total of 10 minutes to address the meeting with no one person being able to speak for longer than 5 minutes. The Town Clerk also explained the traffic light system to speakers.

Mr. Paul, from DP9, addressed the Sub-Committee and noted they had been hard at work since the last meeting when the Sub-Committee had asked for the approach to the public realm to be reevaluated and Mr. Paul stated they had done as asked. He noted that the work had taken place in consultation with those who attended the last Sub-Committee meeting on the proposal and a consensus had been reached. Mr. Paul referred to a letter from the Lime Street ward team, along with correspondence from neighbours at 122 Leadenhall Street, that supported the changes and further noted that Lloyds had also withdrawn their objection to the application. Mr. Paul informed the Sub-Committee that the outcome of the review had been a positive one and the overall design had benefitted from the critique. Mr. Paul thanked all those who were involved.

Mr. Hyde addressed the Sub-Committee and stated he was aware there may have been Members present were not present at the Sub-Committee meeting in July 2024 and informed Members he would brief summarise the proposals before he moved on to introduce the amendments that had been made. Mr Hyde also noted that Mr. Lim was in attendance who represented the owners. Mr. Hyde stated the owners had been instrumental in securing the 2019 planning consent and remained fully committed to taking the development forward. Mr. Hyde told the Sub-Committee that at just under 310m tall, the building would be the tallest in the City, London and the UK and it retained it totemic form from 2019. He informed Members that the two uppermost floors

were fully public spaces and was pleased to confirm continued collaboration since 2015 with the London Museum to provide the learning centre. He also told the Sub-Committee that the proposals would provide over 153,000sqm of the best-in-class office space with access to local terraces on the floors, as well as common landlord amenities and outdoor gardens at the main terraces. He explained this alone would represent around 10% of the forecasted occupier requirements in 2040as was evidence by the City's own research. Mr. Hyde stated that the office areas were of different sizes and characters and allowed for flexible occupation for the widest cross section of workplace requirements. A lot had been learned from other tall buildings, and the building would not only be lean in embodied carbon but would operate very efficiently. He continued that in addition to the contribution of space for business, the building epitomised the City's desire to be a destination for all and provided over 5000m^2 internal areas and around 6,500m^2 of external public paces at grade and level 11. Mr. Hyde drew attention to the elevated public garden and its own ecosystem of public amenities at level 11, as well as other public areas lower down the building which included a restaurant. He further stated that generous, vibrant, accessible and flexible public realm at grade had been proposed which fully supported the Eastern City BIDs' recently launched public realm strategy and had recently been endorsed by them. He further noted that there were extensive future Section 278 works to improve St. Mary Axe. Mr. Hyde concluded that a number of comments and questions regarding the spaces had been heard in July 2024 and hard work had been done through the summer, in collaboration with local ward Members and other stakeholders. Mr. Hyde indicated that the input had been appreciated and was pleased that they were now supportive of the proposals.

Mr. Parry addressed the Sub-Committee and told Members that it was a generous building and there was an aspiration for it to be a next generation classic of its kind, both for the public and for occupants. He stated that it had been modelled to provide a series of urban horizons at the street level, the elevated public garden amenity floors, the London Museum, classrooms and a viewing gallery at the apex of the building. He also told the Sub-Committee it was a building of character with facades designed for longevity and calibrated for performance and was not another glass tower. He added that the step massing provided a range of floor plates to attract future tenants in the sustainable development. Mr. Parry stated that the redesign of the lower levels had improved both the public realm and the engagement on the three active frontages; to the north, Undershaft with a reposition cycle hub entrance, along St. Mary Axe through improvements under Section 278, and the western pedestrian route which connected St. Helen's with Leadenhall Street. He added that the redesign for St. Helen's Square had been enlarged by setting back the base of the building by 10m, so 80% of the existing public space at ground level had been retained. This would allow more flexible use by the local communities in a fully accessible square with an enlarged grove of trees, more seating, and a new focus with a large public screen curated to support Destination City. Mr. Parry stated, secondly, that Undershaft Square, the current space behind the Leadenhall Building, could, by a relocation of the cycle hub entrance, be reimagined as a quiet space for nature and connected to the public garden above. Thirdly, Mr. Parry stated, in relation to public access, that a single public

entrance, which replaced the previously proposed two entrances, would now be directly off St. Helen's Square with a civic scaled stair and two fully accessible lifts which allowed entry to level 1, while the public lift served levels 2 and 3. He also noted the public garden at level 11, as well as the two lifts that served te top of the building and stated the public spaces had been designed for the flow of visitors and the provision of security screening that would be necessary. Mr. Parry added that by relocating both the restaurant and some cultural uses to lower podium levels, the predominantly glazed base of the building was now more animated and attractive and the elevated public garden would provide a natural respite from the busy city below. He further stated the level would give a unique experience of the notable architecture within the cluster and of St. Paul's and The Shard. Mr. Parry informed the Sub-Committee that the area of accessible public realm had been increased by up to 40% and he stated he was confident that these were all improvements and would further enhance the strong and compelling civic quality that was woven throughout the design which defined and set it apart as the cluster's totemic centrepiece.

Mr. Astrop addressed the Sub-Committee and thanked the policymakers of the City of London for an ambitious commitment to biodiversity. He stated he believed that the project was the beginning of a global paradigm shift and thanked Sub-Committee Members for their feedback. Mr. Astrop stated that the Sub-Committee had previously commented on the number of public benches which had been increased from 268 to 350 where the public could now take lunch breaks. He added that the public could now also take their lunch on the elevated public garden of 2,500sqm with 51 trees and biodiverse planting which was critical in helping to deliver more than 500% biodiversity net gain. Mr. Astrop also told the Sub-Committee that the garden also offered benches inside a free, and enclosed, garden room which ensured it would be pleasant to use all year round. He also noted that the Sub-Committee had commented on the ground floor, which had led to an optimised entrance for bicycles and a place had been designed for a place full of plants that would strive in those specific conditions. Mr. Astrop also stated that the Sub-Committee had commented on St. Helen's Square which would now have a step-free surface with access for all and a pavement that aligned and merged with adjacent public space. The space would also provide 17 mature native trees instead of 12 and the York stone would remain.

The Chairman invited Members to ask questions of the applicants.

A Member noted they had previously asked a question about the height of balustrades around the public area as they understood they were 2.5m tall and were made of glass, but sought clarity as the report referred to balconies that would incorporate balustrades of 1.5m high. The Member also queried whether a metal balustrade of 1.5m would be included with a 2.5m high glass balustrade. A supporter confirmed that 2.5m was the determined height as proposed and stated it was important there was a rail behind the balustrade to absolutely deter.

The Member also stated she understood that the scheme had come forward as the developer had previously said the trellis scheme floor plates were not

sufficient which was why the redesign had occurred and queried whether it was correct that the developer had now been able to incorporate a design by allowing the garden space with sufficient floor plates and whether it was larger than the previously agreed scheme. A supporter stated that was correct and the previous planning permission had been technically implemented since the last meeting the development was discussed at. The supporter further explained that the planning permission would have lapsed so a commercial decision was made to implement the consent rather than lose it and the CIL payment had been made. The supporter stated that the decision to apply the previously granted planning permission demonstrated a commitment to the site and believed that the application was the future for the site.

Another Member asked a question on who held responsibility for the running costs of the Museum of London classroom and queried how many classrooms in the sky were needed given one had been consented the week before and what analysis had been done on the number of children who needed to use the classrooms. A supporter stated they had been in discussion with the Museum of London for a significant amount of time and the intention was that the spaces would be self-sustaining. The supported added that the Museum was used to running spaces by allowing private hire to fund the spaces and the landlord would provide and fitout the space, so the operational costs were relatively small, and the same servicing would be used to get into the building. The supporter further added that there would be a mode which would be a blend of the money generated on site, any grants which were available and any contributions from London authorities which is where it was aimed to give every child in London the opportunity to visit it and any sponsorship that could be received. The supporter also stated that the landlord was fully supportive of the Museum to keep in operating. In regard to the question on how many children would use the classrooms, the supporter stated 3 or 4 classrooms had been proposed and that was based on being able to turn through all children at some point in their education, both at the secondary and primary level.

Clarity was sought by a Member on whether the expectation was that all children in London would visit one of the classrooms in the sky at some point. The supporter stated that it was the ambition and every one of London's children should have the opportunity to visit the classrooms. The Member queried whether detailed work had been carried out on the scale of children that would visit the classrooms. The supporter stated that it had been looked and now there was a seven-year journey to work out how it would be implemented. Another supported stated that the desire to learn about London through the London Museum was compelling for schools and the ambition was to enable every young person in their learning life to pass through the classroom in the sky. The supporter added that the unparalleled quality of experience delivered by the London Museum was hugely valued by schools as it was embedded in the London curriculum and hoped that would give Members assurance that the quality and mechanism to attract young people and schools to the classroom was strong.

A Member asked the develop to recommit that the public spaces would be public spaces once the building had been completed. The supporter stated that

the public ground space had been designed precisely to be publicly accessible and separate from the office space and told the Sub-Committee that if there was an element of potential privatisation in the future, it would have to return to the Sub-Committee for agreement as it had been set out in planning conditions and legal agreements and felt that was highly unlikely.

The Member also sought some clarity on St. Helen's Square being a place for nature as they understood how flora could be introduced through planting, but was unsure how fauna would be introduced. A supporter stated there would be a lot of native species of flora that would adapt to the local climate and attract birds.

The Member also sought to understand whether the height of the building at 310m was necessary as the Shard was 309.6m and felt the description of the building as 'totemic' was disappointing and considered whether it could have been a more modest height. The supporter told the Sub-Committee that it was at the centre of the cluster and felt it was an opportunity to build to the highest height. They added that they felt it was entirely appropriate in order to maximise the site.

A Member sought information on how many classes would go through the classroom in the sky in the course of a day, whether the area was solely for the use of the Museum of London and what would be done with the space at the end of the day when children had gone home. A supporter explained it would be mixed-use like the museum in Smithfield and there would be events for both adults and children and aimed for 300 pupils to come through the classroom every day. The supporter also explained that the amount of time classes could visit was constrained to the middle of the day and adults would visit outside of classroom hours. The supporter added that, to be sustainable, the museum needed to generate income, such as the provision of refreshments and shops, but stated it was absolutely about the public benefit and the museum was committed to that. The supporter told the Sub-Committee they would work through the details with the landlord and felt very assured that a compelling educational offer that benefitted the public would be created.

A question was raised by a Member on whether the Museum of London based at the development would recourse to funding from the City of London. The supporter confirmed it would not. The Member further queried whether the museum could be adequately funded through sales and the renting out of the space. The supporter stated that the fitout was supported by the landlord and, in terms of operational costs, the main building would be supported by the landlords which meant the museum would not have those costs. The supporter added that the staffing costs would be borne though the sustainable model developed with the proposed project.

The Chairman opened the floor to questions to the Officers.

The Chairman noted the refreshed National Planning Policy Framework (NPPF) issued by central government and asked Officers to clarify what aspects needed to be considered for the application and future applications. Officers

stated an addendum was circulated the day before which set out the changes to the NPPF and how it would impact on schemes before the Sub-Committee. Officers added that the changes did not significantly alter the assessment of the applications against the NPPF or the weight given to it and they did not have significant implications for the issues set out in the main reports for either scheme. Officers highlighted the main changes that had been made; a presumption in favour of sustainable development had been strengthened in some situations where policies were out of date, a new requirement had been added to recognise and address specific locational requirements of different sectors, the introduction of a vision-led approach to sustainable transport, greater emphasis in relation to developing brownfield sites and specific reference to the government's goal of meeting net zero by 2050, and for climate impact, urban heat and island flooding to be taken into account as relevant. Officers added that the addendum did set out where the issues had been covered in the main reports for each application and updated the references to the NPPF. Officers stated that in their view, the City Corporation's policies and practices were already ahead of the curve on those issues and added that Members would be aware that the starting point for determining applications remained the development plan and the NPPF which set out government policy, and was a material consideration to be taken into account alongside other material considerations.

A Member sought clarity on the mention of a Section 278 agreement with regard to the pedestrianisation of St. Mary Axe and a small section of Leadenhall Street. Officers told the Sub-Committee that the Section 278 area would include part of Leadenhall Street and the City Operations team were currently consulting on proposals for pavement widening and public realm improvements along the length of Leadenhall Street. Officers added that the scope for the works under the proposed application would be determined under a Section 278 agreement.

The Member also asked whether there was any opportunity for improvement at ground level at 122 Leadenhall Street. Officers informed the Sub-Committee that there had been scoping of enhancements to the ground floors and ideas were being developed. However, none of those ideas had been shared with Officers to date.

A question was also posed in regard to the corner of Undershaft and St. Mary Axe by the Member as they understood it would be a vehicle access, but there did not seem to be any inclusion of greening on the corner and asked whether there was scope to consider something. Officers stated there were practical constraints, but a valid point had been raised with the greening and they indicated this was something that could be explored through landscaping conditions recommended in the schedule.

A question was raised by a Member in relation to the amount of office space proposed in the development and whether it was the same as proposed in July and the office space had just been moved around. Officers

A Member asked, in relation to the amount of office space proposed in the development, whether it was the same as proposed in July, as objections were related to the effect on neighbouring light and the public realm, and further queried why it was not part of discussion about amendments if office space had just been moved around and not reduced. Officers stated that the changes to the floor space between the July 2024 application and the revised scheme as set out in paragraph 32 of the report did not that there was a small reduction in office space. Officers added it was a reduction from 154,156sqm in the July 2024 application to the application before the Sub-Committee which was 153,602sqm. Officers further stated it was partly due to some of the relocation of the public and amenity spaces which resulted in slight changes to the office across the podium floors, but Officers did not consider that it had significantly reduced it and it was still a significant quantum of office space proposed.

The Member further queried on the massing and whether things had been moved around as there had been mention of increasing the area of St. Helen's Square. The Member also asked whether the space would be added on somewhere else onto the building in terms of massing as it was difficult to follow what had happened in in terms of the lower levels of the building. Officers stated that from ground level to level 3, the building had been pushed back by 10m and some of that massing from the south had been moved around to the west side of the building and all the changes to those floor spaces, the movement of the uses and the implications were set out in the report.

A Member asked, in relation to the unsympathetic servicing ramp that had been mentioned, what Officers could the Sub-Committee was in the previously consented scheme in 2021 compared to the scheme that did not progress in the summer of July 2024. Officers stated it was largely the same as the proposed scheme, the road moved northwards and it would have built over the ramp. Another Officer stated that the previous scheme in 2021 had vehicle lifts on Undershaft as well.

Clarity was sought by a Member who stated that the tables seemed to have the figures for the whole life, carbon options table in metres squared, but not the figures for the total amount and questioned why that had been removed as it was a key figure in terms of the actual carbon impact in terms of the emissions. Officers stated that the table had been extended to show the absolute carbon emissions and the addendum showed that option 4 had a whole life carbon assessment (WCLA) impact of 310,847,000kg of CO_2 compared to option 1, the minor refurbishment option, of 158,094,000kg of CO_2.

The Member asked, if we looked at the major refurbishment against the option proposed, whether there was a differential rate in absolute carbon emissions between the July 2024 application and the proposed application and queried whether the 406,000 tonnes of CO_2 figure had removed the decarbonisation assumptions or whether it assumed the decarbonisation of the grid. Officers stated that the minor refurbishment had half of all the absolute carbon emissions of the new-build scheme, and the lowest carbon option was option 2, the major refurbishment option, that could reduce emissions significantly through the use of heat pumps and would be a quarter of the carbon emissions

of the proposed scheme. Officers added that the whole life cycle of carbon emissions were now calculated to be 390,481 tonnes of CO_2 and that was without decarbonisation as the GLA required. Officers further noted that once the grid decarbonised, it would reduce significantly. Officers added that operational carbon emissions had reduced from 746kg per square metre to 664kg per square metre which was due to the applicant further developing their model of the building from the July 2024 scheme and the total carbon emissions had been reduced from 2,247kg to 2165kg per square metre.

A Member sought assurance over the use of the classroom in the sky and balustrades as to whether they had been clarified in a condition that was watertight as a developer had previously misinterpreted a condition. Officers stated that the classroom in the sky would be secured through an obligation in the Section 106 agreement, not through condition, and they looked to seek agreement of the terms that had been discussed at the meeting through the Section 106 agreement. Officers added, in reference to suicide prevention, that there was a condition on the balustrades and would be condition 55 on approval. Officers further added that they would be drilling into the detail of the Supplementary Planning Document (SPD) and the requirements that were needed. Officers also told the Sub-Committee there was a condition on the balustrade of the doubling-up of requirements to ensure suicide prevention.

The Chairman moved to a debate of the Sub-Committee on the application.

The Chairman thanked the applicant, Officers, neighbours to the scheme, and ward Members and stated that the deferral of the decision in July was not a common action for the Sub-Committee to take. The Chairman added that the Sub-Committee did it on specific grounds around minor alterations to the ground floor and all parties had come together cooperatively in the last few months to deliver what was before the Sub-Committee.

A Member stated they were concerned with the design of the development, and it was an issue the heritage lobby had picked up as well. The Member added they commended the work put in, but felt the building at the lower level had a clear and detrimental effect on the quality of the public spaces around it. The Member further stated there was an increase in carbon footprint compared to what currently existed and there was a direct loss of a large section of the existing space that had a clear sky and no longer would. The Member further added that the heavy dominance of the building at the lower levels and it had a vast oversailing podium. The Member told the Sub-Committee that that it was compromising too and they had expected a reconsideration of not just what happened at a higher level of the building, which had improved, but the ground floor too. The Member added it had compromised the public realm far too much and he stated he could not support a building that was trying to do too much. The Member stated that it was a balance between optimisation and the public realm, and the public realm had to be valued. The Member concluded that the proposal was overselling the garden, and it was the wrong approach and he could not support it.

Another Member stated that not much had changed in terms of the actual figures with regard to the loss of the public realm which was a very rare large space of public realm at the ground level in the City and tiny pocket parks had been put forward as a public benefit. The Member added that the Officers worked incredibly hard to create pocket parks which had some genuine scale and further stated that the reduction in square metres from 4,669 to 3,850sqm was half the size of Manchester Cathedral at 704sqm which was a significant amount of loss. The Member told the Sub-Committee that it was losing when it had very little and endorsed what had been said by the previous Member.

A Member told the Sub-Committee they were not present for the initial consideration of the application but had opportunity to compare the two schemes and felt it was worth reflecting on the changing shape and size of the public realm that had been provided. The Member stated there was a reduction but, compared to the previous scheme, was less so and felt hat should be commended as a sign of being listened to. The Member added that it appeared to them that the classrooms in the sky would probably be cross subsidised by the footprint of the larger business model at the Museum of London which sounded entirely feasible and reasonable and it was the kind of thing that should be supported. The Member further stated that while another Member had described the new garden area as bolted on, he felt that it showed a willingness to compromise and adapt which was something he felt the Sub-Committee should encourage. The Member concluded that while there was some harm to the public realm and heritage views, he felt the economic benefit, the benefit from sustainability and the adaptability and compromise that had been made had drawn him to support the application.

It was stated by another Member that it was interesting to hear other Members use the word ‘compromise’ in regard to St. Helen’s Square and added that the point had been well made about the building trying to do too much. The Member commended the developers and designers for their work, but the ambition to achieve the height proposed, and the idea it was of significant strategic value, was nonsense. The Member further stated that the real strategic value was those buildings being close to a public transport hub. The Member added that their real concern was the natural environment, and the reality was there were a lot of failing green spaces around the City due to nature having to do things it could not do and stated that the idea that the space would flourish, be it for flora or fauna, was misleading. The Member concluded that if a public space was being created which was healthy and good for human beings, that needed to be carefully thought about.

Another Member stated they thought it was great that the development would be the tallest building and added it would be a great advert for the City, and to aim for anything less would be disappointing.

A Member stated that moving the space from the shadowed area in the west to the south which was sunnier was smart and a good move. The Member added, in terms of the building itself, it was not boring which was important and having a podium at 42m allowed the public an opportunity to view the iconic buildings around it as the architects had envisaged it. The Member noted that it was a

smart height to look at other buildings at rather than from above and felt the podium would be a great success. The Member concluded that the other advantage was the dedicated lift which meant the public could be at the podium in five minutes, have lunch, and come down again and indicated his strong support for the building.

Another Member told the Sub-Committee they disagreed on the benefit of having the highest public viewing platform, which was situated behind the previous highest viewing platforms. The Member also stated that the degradation of the public realm at street level was very concerning. The Member added that the ground level entrance looked like a cave and stated she did not think that an overshadowed square was going to be an attractive place to sit no matter how many benches were installed in it. The Member concluded that they would not be supporting the application.

A Member stated it was an unusual proposal and indicated she doubted whether or not the application would return to the Sub-Committee in time. The Member told the Sub-Committee she felt that if the applicant had a bit more time, they would have been able to revise and refine it to improve it. The Member added they had concerns about the loss of the ground floor space and whilst one could get a lift up and have lunch quickly, in practical terms it would be impossible as seen with other gardens in the sky where there had been long queues of visitors whilst those who lived or worked in the City would struggle to get up there in their lunchtime. The Member further stated that it was seen during Covid how crucial the open space was for those who had stayed in London and the City, and as people had come out of Covid, they had realised how important the natural environment was. The Member further added it was a shame that something would be lost which could not afford to be lost because the space was not available to be given away. The Member stated she was sure the architect could be creative and keep the open space while designing a building that was viable for the clients and would have preferred the developers to take a little more time rather than rush it through as they thought it could be refined a little bit more.

The Chairman stated the Sub-Committee had looked into the application in depth and acknowledged there were subjective differences of opinion on the architectural merits. The Chairman told the Sub-Committee that it was his feeling that the Sub-Committee should be bold and allow architects to be bold in their vision of what was delivered in the City. The Chairman added that it was important that there were features that were attractive and drew visitors above the ground floor. He stated that the winter garden that had been proposed offered a unique perspective in the heart of the cluster of tall buildings in the Square Mile. In reference to the ground floor, the Chairman added that a lot of work had been done on creating Undershaft Square and it as a vital element of the eastern cluster as there were not that many open spaces and was proud to see another 10m given over to the public realm. He further stated that as one came into the square, their eye was drawn to the London Museum and the public access into the building. The Chairman told the Sub-Committee that Officers had been working hard to ensure the building did feel open and accessible to all and, for those reasons, supported the application.

The Chairman moved the meeting to a vote.

The Town Clerk confirmed that Members were voting on Item 3 and the recommendations on Page 12 of the main agenda pack, with any relevant amendments set out in the addenda.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 16
OPPOSED – 7
There were no abstentions.

The recommendations were therefore carried.

RESOLVED – That, Members approved the following recommendations:

(1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);

(b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2021 and the application not being called in under section 77 of the Town and Country Planning Act 1990;

(2) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.

(3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.

(4) That members note that land affected by the building which is currently public highway and land over which the public have a right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may procced with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order under the delegated arrangements approved by the Court of Common Council.

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

4. **BURY HOUSE 1 - 4, 31 - 34 BURY STREET, LONDON, EC3A 5AR & 5. HOLLAND HOUSE 1 - 4, 32 BURY STREET, LONDON, EC3A 5AW - LISTED BUILDING CONSENT**

The Chairman stated that Agenda Items 4 and 5 would be taken together.

The Sub-Committee considered a report of the Chief Planning Officer and Development Director regarding Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR specifically the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. The Sub-Committee also considered a report of the Chief Planning Officer and Development Director regarding Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW, specifically the restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

The Officer stated that the presentation was a brief summary of a more comprehensive presentation which had been published. She added that two addenda had also been published to address additional representations and matters relevant to the new National Planning Policy Framework (NPPF).

The Officer stated that the application related to a site located to the northeast corner of Bury Street, northwest of Creechurch Lane. It comprised three buildings, namely Holland House, a grade two star listed building, Renown House and Bury House. It was within the recently designated Creechurch Conservation Area. Other designated heritage assets were located near the site, including the Bevis Mark Synagogue, a grade one listed building.

Members were informed that the site was located at the heart of the Eastern Cluster which contained the greatest density of businesses and jobs in the City.

It was also within the city cluster key area of change and the city cluster Tall Buildings Area as identified in the emerging City Plan 2040. In terms of the context of the area the site sat within a number of existing, consented and implemented tall buildings, including the Gherkin, 100 Leadenhall, 1 Undershaft, 24 Bevis Marks and 1 Creechurch.

The Sub-Committee was informed that Bury House was a seven-storey commercial building built in 1967. Members were shown existing floor plans and elevations of the building. Renown House was a five-storey office building, built in 1912. Although not a heritage asset, Renown House was a characterful survival of a small-scale office building. Members were shown the existing floor plans and elevations of the building. The Officer stated that Holland House was a grade two star listed building which was built to designs of Berlage in 1916. It was of expressionist style with vertical architectural form finished in distinctive grey green faience. Members were shown the floor plans and elevations of Holland House.

The Sub-Committee was advised that planning permission was sought for an office led development involving the demolition of Bury House and erection of a new building comprising four basement levels, ground plus 43-storey restoration works, Holland House and Renown House including extensions, interconnection of the three buildings and construction of a single core within Bury House to serve all three buildings.

The Officer advised that listed building consent was also sought for the external restoration works to Holland House, the partial demolition and construction of the four-storey roof extension, together with the internal alterations including truncation of the existing light well.

Members were informed that the proposed development had been designed to activate the ground floor and optimise inclusive public realm. The Renown House ground floor plate would be lowered to provide step-free access to both Renown House and Holland House. Step-free access would also be provided throughout James Court, Heneage Arcade and Bury Street. Access to the cycle parking would be off Creechurch Lane and Heneage Arcade. There would be one servicing point of Heneage Lane to serve the whole development with consolidated deliveries not exceeding 33 vehicles a day and a blue badge parking bay was also proposed within the designated servicing bay to serve the proposed development. 582 long stay and 85 short stay policy compliant cycle parking spaces were proposed within the lower ground and basement levels along with dedicated cycle repair space supporting the provision of new skills in the area providing training and jobs for young adults. Policy compliant end of trip facilities would be provided at basement level two.

The Officer highlighted the existing and proposed public realm arrangements. Despite the relatively small site footprint, the proposed building would provide over 600 square metres of new external public realm providing over 75% uplift. Members were shown a ground floor axonometric plan showing the ground floor arrangement and its proposed uses. Heneage Arcade would create a new thoroughfare, reintroducing a historic City route with flexible retail cafe uses and

incorporating public art. St James Court would be reimagined, providing a space available to the wider community that was accessible, inclusive and inviting.

Members were shown the proposed lower ground, ground and first floor plans. Alongside the office space, flexible, educational, cultural, community, sports, multi-faith spaces would be introduced which would be combined to create a compelling and inclusive public offer in the heart of the cluster, in line with the Destination City agenda. The proposal would also provide over 1,100 square metres of affordable workspace.

Members were shown the a section of the proposed Heneage Arcade at ground floor and the double-storey flexible auditorium to the upper floors. These multi-functional bookable spaces would attract a wide range of activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available free of charge for community-based groups, non-profit organisations and schools for over 67 hours each week, along with the artwork proposed to be displayed along Heneage Arcade. The proposal would also involve the creation of an outer climbing wall on the facade of the tower fronting St James Court. This would be open to the public, encouraging health and well-being and supporting the provision of new sports and recreation facilities.

Members were shown the indicative floor plans of the proposed development, showing the variation of the floor plates, the introduction of roof terraces, the recessed extensions to the listed building, the tapering of the upper floors of the tower element, the proposed office floor space floor plates which ranged between 350 square metres and 580 square metres for businesses of 50 to 60 people, supporting smaller start-up businesses providing office tenants with their own private entrance and a gated floor space. An urban farm was proposed at the ninth floor of Holland House to be used as a rooftop classroom, providing a nurturing environment for learners to explore plus urban greening. Office tenants would also benefit from access to terraces which would provide a space of calm and engagement with nature.

The Officer stated that planning permission for the demolition of the building at 31 Bury Street and the construction of a 48-storey tower building was previously refused. The reasons for refusal included the adverse impact the development had on the setting and amenities of the grade one listed Bevis Mark Synagogue by reason of the overbearing and overshadowing impact of the development on the courtyard, and the adverse impact of the development on the Tower of London World Heritage Site by reason of the less than substantial harm caused to the LVMF 10A.1 from the Tower Bridge North Bastion.

Members were informed that the current proposal incorporated three buildings rather than Bury House alone. In terms of the tower element, this had been amended to reduce its height by 19 metres and by setting back the top eight

floors to reduce the massing towards the termination point of the tower.

Members were shown the existing and proposed elevations, showing the development within its context. In the southwest elevation the proposed development would be approximately 16 metres lower than the Gherkin. In the northeast elevation, the development would be approximately 84 metres lower than 100 Leadenhall. Members were also shown the northwest and southeast elevations, a closer view of the proposed development at Renown House and Holland House and the relationship with the proposed tower element. They were also informed by the Officer that the development would involve the demolition of the existing clumsy 1960s, 70s and 80s and 80s extensions and their replacement with three additional floors that were set back from the main facade providing a well-considered designed response. She commented that the overall design of the extensions to Renown House would maintain the existing qualities and its relationship with Holland House executed in a different style to continue to be read as two separate buildings. As could be seen from the historic and proposed illustrative view, the additional storeys would have a very limited visibility in the oblique views.

The Officer stated that the building was designed to have no negative impact on the ability to appreciate the historic facades. The proposed element would be a sophisticated new addition to the city cluster through the use of high-quality faience materials and detailing inspired by the immediate neighbours. The proposed building would be an appropriate and sympathetic neighbour in architectural terms.

Members were shown images of some of the different scenarios that had been tested for environmental impacts, including the baseline scenario, the future baseline and the cumulative including the proposed development. They were also shown a table outlining the daylight and sunlight impacts of the proposed development of the nearby receptors. These impacts had been independently reviewed and were assessed in detail in the report. Moderate daylight impacts on some nearby residential properties have been identified. These were considered acceptable considering the context of the City. Negligible effects have been identified in terms of sunlight.

The Officer showed the view of the proposed development from Bevis Marks Synagogue's courtyard with the reduction in height and massing from the previously refused application. Members were shown an image of the interior of the synagogue towards the Bimah and an image from the gallery. Photographs showed the synagogue had large sized windows to all four elevations. The daylight impacts of the proposed development in the synagogue showed an absolute reduction of 0.4% in the gallery and central room between the cumulative and future baseline scenarios, which was considered a minor adverse impact. Members were shown a slide outlining the sunlight impacts into the synagogue. It was noted that these meet the BRE criteria. Members were also shown a visual of the interior of the synagogue. The exhibition centre could be seen and it was to the south of the synagogue.

The application was supported by a qualitative assessment called a radiance

assessment, which showed the level of daylight in a room. 3D visuals were presented which showed the impact on the level of daylight would be localised and in a limited area in the gallery and it would be minimally noticeable. A comparison of the daylight and sunlight impacts from the previous scheme has been carried out by a third party on behalf of the Corporation. The results show that the daylight effects remained relatively comparable, and the sunlight effects of the proposed scheme represented a small improvement when compared to the refused scheme. Members were reminded that the daylight and sunlight impact into the interior of the synagogue was not a reason for refusal of the previous application.

Members were shown a visual of the layout of the synagogue's courtyard as it was in 1925, with a previous annex and as existing following the recent changes to include an exhibition centre with a new ramp and a permanent security and ticketing booths. In terms of overshadowing, the courtyard of Bevis Marks Synagogue would meet the BRE guidelines. Although not a BRE requirement, when considering the average sunlight availability in the courtyard the changes between the future baseline and cumulative were very limited and equated to a maximum of 19 minutes' reduction of sunlight in June. This reduction was not considered to preclude from continuing to use the space for religious events or in association with the visitor centre.

In terms of wind and thermal comfort, several scenarios had been tested and it had been found there would be no safety exceedances. Members were shown the existing wind condition scenario and were informed that with the proposed development built on site, conditions were suitable for their intended use. Landscaping mitigations were only required at the level seven terrace of the proposed development and with all cumulative schemes included, the wind conditions would still be suitable for their intended use and the conditions in the synagogue courtyard would remain suitable for frequent seating.

Members were informed of the importance of viewing the moon to enable the reciting of the Kiddush Levana prayer and stated this topic was subject to a number of objections. To respond to these objections, the applicant had carried out a study of a full lunar cycle. The assessment was based on the visibility of the moon from two observer points within the courtyard which were outlined. The results of the study were that in the existing conditions the moon was not visible at all for three months in the year and this was reduced by one more month in the future baseline scenario and this was due to the technically implemented 100 Leadenhall building. Although the proposed development would reduce the number of hours that the development would be visible from the observer points, it would not reduce the number of months that the moon would be visible when compared to the future baseline scenario. Members were informed that the City of London Corporation had taken positive steps to advance equality of opportunity by undertaking a detailed assessment of the impacts of the proposal on the use of the synagogue, and it was considered that the impacts of the development would not adversely affect the synagogue as a place of worship in order to warrant a ground for refusal.

Members were shown a number of townscape views. In the existing view from Tower Bridge South, with the proposed development and cumulative schemes, the proposed development would clearly form part of the cluster that was read as a distinctive entity from the World Heritage Site. From 10A.1, less than substantial harm was previously identified to the Tower of London by the previously refused development. As could be seen in the proposed and cumulative views the currently proposed development would appear at the east edge of the cluster, providing an eastern endpiece playing an important role in mediating between the cluster and the lower buildings to the east, particularly when compared to 100 Leadenhall and 1 Undershaft. In the view from Queen's Walk, in the existing, proposed and with cumulative schemes it was considered the observer would continue to recognise and appreciate the World Heritage Site as a strategically important landmark set apart from the City.

Members were shown the existing, proposed and cumulative views from the Tower of London Inner ward and the east of Devereux Tower and the local views from Bury Street. It was considered the proposed extensions to Holland House and Renown House would be architecturally designed to be recessive to the architecture of the Grade II* listed façade.

In the view from Bevis Mark Synagogue with the proposed development and with implemented schemes, the synagogue had commanding presence in the courtyard as the forefront of the view. There were existing tall buildings visible behind the synagogue, including 40 and 100 Leadenhall. It was from the courtyard entrance that they were the most visible. When moving into the courtyard closer to the synagogue, they quickly receded into glimpsed background elements. In the view from Creechurch looking northwest with the proposed development and cumulative schemes, the development could be seen as part of a dynamic, denser urban townscape fundamentally characterised by its proximity to other tall buildings.

Members were informed that Carbon Optioneering had been carried out to establish carbon impacts, opportunities and constraints for the environmental sustainability to inform the development proposals and this was independently reviewed. The energy strategy had been optimised for the site and a BREEAM excellent rating was targeted. Circular economy measures had been incorporated, such as retaining approximately 35% of the existing structures, as well as designing for longevity, adaptability and low maintenance. The development would also achieve a UGF of 0.32 which exceeded the policy requirements.

The Officer stated that when comparing the scheme to that previously refused, it was considered the amendments incorporated to the tower element to reduce its height and massing, would be sufficient to overcome the previous reason for refusal in terms of the impact on to the World Heritage Site.

To conclude, the Officer stated that the proposed development would secure a strategic office-led development within the City cluster that would provide land uses which would support the diversification, vitality and growth of the cluster as a 24/7 world class business destination. The provision of over 34,500 square

metres of Grade A office floor space and over 2,400 jobs would significantly contribute to the City of London's economic base. The provision of over 1,100 of affordable workspace free of charge for charities would provide an inclusive offer and attract small businesses. The flexible retail, educational, cultural community, sports, multi faith spaces would create a compelling and inclusive public offer in the cluster in line with the Destination City agenda. The development would result in a significant aesthetic enhancement to the Creechurch locality, and it would optimise the public realm offer. The proposed faience-clad tower would provide a sophisticated form of architecture and new architectural counterpoint to its glazed predecessors. The environmental impacts of the development had been extensively assessed in detail in the report and were considered acceptable by Officers. Officers recommended approval of the application subject to conditions and subject to the execution of planning obligations as set out in the agenda pack.

At this point, at 12.22pm, the Chairman adjourned the meeting for 15 minutes. The meeting resumed at 12.37pm.

At this point, the Chairman sought approval from the Sub-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 Chairman then invited the objectors to speak.

Sir Michael Bear requested that as Rachel Blake MP was unable to attend the meeting as she was in Parliament, that Tilla Crowne as trustee be allowed to speak in her stead.

Sir Michael stated that it was unprecedented for a pro-growth, former Lord Mayor of the City of London to address Members as an objector but this particular application left him no choice. He stated that the City of London was an exceptional place from Roman times to mediaeval times to modernity. Interesting and fine buildings had made the city the unique and highly attractive place that it was. These traditions had created the world's leading financial centre. In 1985, rules were changed, allowing much denser and taller buildings, but this had always been counterbalanced by designating conservation areas, and these preserved the best of the past and had produced a vibrant mix of styles. He questioned how 31 Bury Street fitted into the exemplary planning decisions made by Officers and Members in the past, whether it respected the conservation area it was in and was designated less than a year ago and whether it respected listed buildings and views of the two principal heritage assets of St Paul's Cathedral and the Tower of London as well as the Bevis Mark Synagogue grade one listed building and Holland House grade two listed building. He stated that whilst he did not consider that it damaged St Paul's Cathedral, it did damage all of the other three buildings.

Sir Michael stated that Holland House was an exceptional grade two star listed building of the First World War era with a very unusual facade. He stated that the developer planned for extra floors and Historic England had stated they would not grant listed building consent.

Sir Michael stated that Bevis Mark Synagogue had been continuously occupied since its construction in 1701, it was older than St Paul's and built by the same school of constructors as the Wren churches. It was a unique piece of architecture, a living centre of an important minority community and something to be celebrated in the multicultural City. It was the only non-Christian place of worship in the Square Mile. It had religious rules such as not turning on electricity on the Sabbath, requiring views of the moon and having enough natural light to read the books of the law. Some of its traditions were unique in the world. Members were informed the technical issues about 31 Bury Street were clear. Firstly, there was no significant change in the design apart from a small reduction in height so the grounds of refusal of the first application still stood. Secondly, the current application was in direct conflict with the current City Plan where policy CS14 stated that the Corporation would refuse planning permission for tall buildings in conservation areas. He added that the City had rightly been granting consent for new buildings to deal with the demand for new modern space but as a developer, he knew the market very well, and the development world was in turmoil with no finance available for 13 of the 14 consented towers.

Sir Michael expressed concern that it was claimed that the proposals would preserve the setting and significance of the synagogue and that there would be an enhancement to the Creechurch Conservation Area and stated that the benefits were disingenuous. He stated the majority would apply to office buildings anywhere in the City and others were standard requirements. He queried who the community space was intended to serve and whether it would amount to anything with so many recent applications including similar provisions, and with these uses peppered around the City with no apparent demand or location strategy.

Sir Michael added that to degrade one established community space for a new one elsewhere was not reasonable and that the Officer recommendation completely disregarded the City traditions mentioned as well as the importance of multiculturalism and religious tolerance. He further added that he spoke as somebody who cared deeply about the City's heritage and traditions, and he urged Members to refuse this application as they did the previous one.

Ms Henrietta Gordon informed the Sub-Committee that she had worked as a solicitor in the City of London for over 25 years, she was not Jewish and had no links to Bevis Marks, its community or the wider Jewish community. In addition, no one had asked her to object, she had done so because she believed this was not just a planning application but she believed the Jewish people, their faith and their place of worship could continue to be discriminated against and the law could continue to be broken within the City of London. She stated that this was demonstrated by the ways in which St Paul's Cathedral and the Bevis Mark Synagogue were being treated. She commented that St Paul’s Cathedral opened in 1710 and was afforded a wealth of legal protection by the City of London Corporation and the Mayor of London.
No buildings whether offices or otherwise, encroached upon it. It was justifiably treated with reverence. Bevis Mark Synagogue, by contrast, had little or no

protection and was about to lose its last remaining daylight if this building project went ahead. Ms Gordon stated that the synagogue opened in 1701. It was the oldest synagogue in the UK in continuous use, and it was the only synagogue building in Europe that had held continuous services for more than 320 years. It was the main synagogue built after the readmission of Jews to England by Oliver Cromwell following the expulsion in 1290 and the synagogue continued to be an active place of worship. It was also the only non-Christian place of worship within the City of London.

Ms Gordon stated that St Paul's Cathedral and Bevis Mark Synagogue were both grade one buildings built within a few years of each other, in the early 18th century with almost identical historic and religious significance and yet Bevis Marks was not being offered the same protection that was given to St Paul's Cathedral. She stated that situation would be significantly aggregated if this application was allowed. She commented that the City of London Corporation was subject to the planning and the public sector equality duty in Section 149 of the Equality Act 2010. The principles in the decision of Brown v the Secretary of State for Work and Pensions, had become defining guidelines for the exercise of this duty. The Human Rights Act Articles 9 and 14 also required Christian and Jewish worshippers to be treated in the same way and their places of worship should not, therefore, be treated differently. Furthermore, the Corporation adopted the international definition of antisemitism in full on 5 December 2019. This included antisemitism directed towards Jewish individuals and all their property towards Jewish institutions and religious facilities. Ms Gordon commented that allowing this proposed building to remove the last natural light to Bevis Marks would in her view be a breach of the Corporation's equality duty, a breach of the human rights of the members of the synagogue and an act of discrimination and antisemitism.

Ms Gordon commented that there were approximately 250,000 Jewish people in the UK. They were therefore considered a minority group and, as such, were worthy of protection. She considered that if the application were approved, this would be acting contrary to this. She added that she was objecting because she was concerned at the possible perception of the Jewish faith being treated as worthy of less protection than her own faith and because as a lawyer of over 25 years, she was anxious at the prospect of the law being broken in relation to a Jewish place of worship of equivalent historic and religious significance to a Christian place of worship. Having worked within the City of London for her entire career, she was uncomfortable at the prospect of such discrimination taking place on her doorstep by an establishment that, she strongly felt, should be leading by example. She asked the Sub-Committee to avoid any such discrimination by refusing the planning application and thereby affording Bevis Marks Synagogue the same protection as St Paul's Cathedral.

Adrian Phillips, Director of Historical Palaces, the custodians of the Tower of London World Heritage Site stated they strongly objected to the Bury House application. He stated they firmly believed that the heightened massing of the proposed 43-storey building at the very eastern edge of the cluster would harm the setting of the Tower of London. Mr Phillips commented that it was one of the best examples of castle ever built anywhere in the world. Its landmark siting

and visual dominance on the river edge and the impressive skyline were key to its designation as a World Heritage Site. The setting of such a castle designated to project royal power over its surroundings, was crucial to its significance but the proposed development would fill the clear sky space beside the White Tower when seen from the strategically protected view of Tower Bridge and would erode the setting and value of the World Heritage Site.

The Chairman asked if Members of the Sub-Committee had any questions of the objectors.

A Member asked how the Kiddush Levana prayer was recited when the waxing moon was invisible on a series of cloudy nights and also if following the start of the prayer, it suddenly became cloudy whether the service would be completed. The objector stated that the prayer was said upon seeing the night sky. If that moon was obstructed, then the prayer could not be recited. The reduction in the amount of viewing hours was from 100 to 40 hours and functionally would reduce the number of months that this prayer could be said depending on the year, from four to six months. If someone had been there at the beginning and said the opening of the prayer and then a cloud passed by, they could continue, but this proposal would essentially create a perpetual cloudy sky and would diminish the ability to worship there.

A Member asked Mr Phillips from the Tower of London for more information on his concerns. He stated that whilst the principle of a cluster was supported, it was getting higher and encroaching on the tower. The views of the tower were so sacrosanct to the understanding of its significance and appreciating it as something that reigned over the City for many years. It was a key asset for the City which welcomed over 3 million visitors a year and that really supported the City and the Destination City Programme. The Tower was therefore an important asset that should be embraced and welcomed and it was considered that this development was too close.

A Member queried the UNESCO and ICOMOS concerns on the encroachment to the World Heritage Site and were advised that a state of conservation report had been received by government along with a technical review of Bury Street.

A Member asked a representative of the synagogue why they considered the development to be a major threat to the synagogue e.g. the impact on lighting levels and the ability of the synagogue to function. She also asked if there were any other heritage harm. She added that the scheme had changed since it was previously submitted and asked whether policy changes had impacted either positively or negatively. A representative from the synagogue stated that the functional impact was that the synagogue was a living community. It was probably the only Jewish community in the world today that had maintained continuity back to 1700. This made it a place of profound international and deep significance to the Jewish community and this development would have a meaningful and significant impact on the community's ability to continue to use the space and to worship. The development would create a perpetual cloudy evening, and the internal light levels would ensure a perpetual winter morning. These were real, tangible impacts.

Currently, nearly all the light daylight present, particularly in the ground floor of the synagogue, was a product of light reflected off the surrounding surfaces of the buildings of the courtyard around it. This made this building very unusual as it put it beyond the normal boundaries of the day lighting of buildings. Members were shown an indicative image which showed the creation of a huge degree of shading during parts of the day and it was stated that the report submitted to the Sub-Committee gave an empirical example of this and there was a comparison between the effect of One Creechurch and that of the proposed development. It was suggested that as the current methodology used for understanding the impact of day lighting and its reduction did not take into account the reflective characteristics of the surrounding buildings, as a result, the proposed methodology used was deficient and a significant part of the submission was to try and demonstrate that. As a result, it was considered that the Sub-Committee had not been given the full picture of how much harm was being done to the day lighting of the synagogue. An objector stated this was an exceptional grade one listed building that was essentially like a cathedral building and the courtyard of the building was an extension of the synagogue and was intrinsic to its heritage significance. The synagogue did not have a vestibule but had a courtyard and therefore the building and its courtyard were both of exceptional interest. The prominence of the synagogue was also intrinsic to the significance, and as could be seen in the images shown, this prominence would not be preserved. The light into the synagogue was essential for the synagogue to function as such. If that was somehow prohibited or diminished, then the significance of the synagogue as a working building would be put into question and this would cause a high level of heritage harm together with architectural impacts.

A Member stated that the Officer had stated there would be a minor adverse loss of daylight, that in the gallery, the loss of or the impact on daylight would be minimally noticeable and that there would be no adverse effects that would prevent the synagogue from remaining as a place of worship. The Member asked the objectors reasons for not accepting these statements.

A Member queried an objector's suggestion that Bevis Marks synagogue was comparable to St Paul's which he considered to be a slight distortion of history as Cromwell permitted the synagogue to be built on the basis of it being a discrete private place and it had never been open to the public or visible in the same way as St Paul's so he did not consider it fair to compare the two buildings. He stated they were both important buildings with Bevis Marks possibly more so in some ways as it was the only one in the City whereas St Paul's was one of many churches. The objector stated that St Paul's was so well protected by the City of London, not because it was open to the public, but because it was a place of reverence and a place of historic interest. It was a grade one listed building built at the same time as the synagogue.

A Member queried Ms Gordon statement that the proposal would remove the last natural light from Bevis Marks which was contradicted by Officers. Ms Gordon stated the Officer report confirmed that the light study carried out by the applicant did not take into account reflected light. The objectors had demonstrated with their study that the overwhelming majority of the light in the

synagogue was derived from reflected light. Without a study that took that into account, the loss that would occur could not be measured. The objectors' study had measured the loss that has occurred from One Creechurch, which was the same distance away, where only 20 storeys had caused the light levels to plummet by overshadowing the synagogue. It was stated that it was highly likely that the same plummeting of light levels would occur during the hours of 31 Bury Street obscured the sunlight over the synagogue.

A Member having clarified that Ms Gordon practiced law asked her to confirm that she had stated that if the application was approved, the law would be broken and that the Sub-Committee would be acting contrary to certain people's human rights. She responded by stating that in her understanding the Sub-Committee would be in breach of their duties of Section 149 of the Equality Act 2010, Articles 9 and 10, 9 and 14 of the Human Rights Act and would not be committing to the international definition of antisemitism which the Corporation had subscribed to on 5 December 2009, which meant that the Jewish community, its institutions and religious facilities, were supposed to be protected. By allowing this building to go ahead she considered this would be damaging a Jewish place of worship. The Member then asked Sir Michael Bear who had worked with many of the Members present if he understood how offensive such comments could be to certain people present. Sir Michael Bear stated that people were speaking from the heart and it was worth hearing their comments. He stated he was not there to judge and the campaign embarked upon had been an elegant, sophisticated and respectful one. The Member commented that the City was hosting a Hannukah reception the following week. Sir Michael Bear stated it was ironic this was the festival of light. The Member stated that it been mentioned that the building under consideration was not financed and that this was not a material planning consideration. Sir Michael Bear conceded with the point.

A Member asked given the continuous freedom of worship at Bevis Marks for the last 300 years, what impact this would have on that continued freedom. An objector stated the synagogue was built by Jews who found refuge in this country escaping the Spanish Inquisition. The City of London had protected the community for nearly 400 years and it would be tragic if the planning decision harmed the ability to continue to worship in the place where it was first guaranteed in this country.
The development would make it more difficult to read the prayers, if it is more difficult for us to say particular prayers and the synagogue would become simply a heritage asset and would cease to be the longest continuously operating synagogue in the world. This should be a source of pride and be preserved and protected.

A Member asked an objector to clarify the difference between the image of the real world impact and the expected image in relation to One Creechurch. Using the images, the objector outlined the differences with One Creechurch, having a substantial effect on the interior lighting of the of the synagogue. In relation to the Bury Street proposal, there would be a period of time in which the courtyard walls would be similarly shadowed as they were by 1 Creechurch Street so whilst the effect could not yet be given in absolute terms, in indicative empirical

terms there was a similar depreciation of the daylight levels within the synagogue.

The Town Clerk invited the applicants to speak. Alexander Morris stated he was speaking on behalf of the applicant who had been investing in developing in London for over 20 years and was the largest non-listed London Office Fund with real estate in Westminster, the City and Islington. He stated the application provided substantial economic, environmental and social benefits. The economic benefits of the new office space would deliver the strategic objectives of the draft 2040 City Plan. Mr Morris stated the environmental benefits of the scheme were consistent or better than recent applications approved by the Sub-Committee and advised that he was joined by six people to illuminate the substantial social benefits in their own words, representing some of the 250 groups that had been engaged with across education, multi-faith charities, sports and culture.

Mr Alex Feldman, Deputy Headteacher at Dairy Meadow Primary School in Southall stated that this was a state school that served an area of high deprivation in the Borough of Ealing. The majority of the children were first or second generation immigrants from South Asia. They did not have English as a first language and had parents that majorly work in the black or gig economy. He added that his passion as an educator was for children to dream big and realise that their background class, creed, colour or religion should not be barriers to future success. Having Holland House as a tangible resource in the City of London over the last three years had crystallised this, from visiting and seeing the grave of the Roman girl at the entrance travelling through the age of Empire and into a boardroom modelled on the Titanic, Holland House truly made the history curriculum come alive. All of the children at the school knew what CEOs were, but Holland House gave them a chance to sit at the head of the head of a boardroom table. Mr Feldman advised that world of work days had been held, primary school children had met individuals involved who contributed to the construction and the running of Holland House and there had been CV writing workshops and mock interviews. School counsellors had visited to know more about the City of London and could tangibly see now how they could be the next cog in the engine of the mercantile centre of the UK. He added that even by getting on the Elizabeth line to travel up to Holland House, the students got the idea that they could engage with the buildings and could see themselves as future city workers. The hands-on immersive experiences provided the children with real world examples of their learning. There were plans to work with the urban farm to build on ideas of sustainability and teamwork within the STEM sector. This enrichment could never occur within the constraints of the school. Thanks to the visits to Holland House, Mr Feldman had witnessed the children develop their own sense of self identity, learnt from the rich history that surrounded them and the cultural grounding of Holland House. He was confident in saying that the students could now see themselves as decision makers and hopefully future leaders.

Harshita Patel, City resident, parent carer of a teenager with autism and an advocate for families facing special education needs and disabilities (SEND) stated that through her work with the City Parent Carer Forum and the SEN

Board, she had witnessed the unique challenges that families encountered. As an access and inclusion consultant in the public realm, she had collaborated with organisations and this year she had applied for the Barbican Imagine Fund. Together, over 100 individuals had been supported in accessing free creative arts and sports, thereby enhancing their health and well-being in the Square Mile which had limited public spaces and bureaucratic hurdles that often left families isolated. There was a significant lack of safe areas for regular activities and essential facilities. Ms Patel stated there was a need for community centres that were grassroot led, providing structure and fostering a sense of belonging. It was crucial for City planning to consider the needs of families with SEND and other marginalised groups. A great example of inclusive design was Holland House. It prioritised accessibility, featured changing places toilets, sensory areas and spaces tailored for various needs. It created a new standard for accessibility environments, breaking down barriers to participation. Ms Patel added that creating inclusive spaces could profoundly impact the community by promoting dignity and by encouraging involvement, a stronger, more supportive environment could be created for everyone.

Ms Shahida Victor, from Greenhouse Sports charity, stated the charity developed young people through sports and mentoring. She stated that being a Muslim from Fiji, where cultures met, versatile values were united in harmony and she was delighted to learn of Holland House which was a house of hope where different faiths were celebrated. Differences were embraced and welcomed and the space would serve as a platform to unite people in cohesion and build bridges. Ms Victor stated she was speaking as a representative of both community and faith groups, a voice that transcended and united as with up to 150 Muslim men and women joining Friday prayers sessions at Holland House every week. She added that Aslam Baccus, trustee of Halls For Jamar had stated the venue supported multi-faith groups and community based projects in a cultural and professional space supporting diverse initiatives that promoted inclusivity and learning. She further added that this support was shared by Dharf Patel of the City Hindus Network and Param Singh of the City of Sikhs Network who welcomed the proposals, emphasising how activities could be expanded to engage more effectively, sharing their delight at discovering this affordable venue in the City and the opportunities to foster connections and strengthen community ties at Holland House. St Helen's Church in Bishopsgate had welcomed additional space provided at Holland House with Mandarin Christian groups Sunday School, podcast recording sessions and other activities benefiting from its inclusivity and accessibility.

Mr Troy and Ms Kuku Richards, founders of the Museum of Diversity stated they were speaking not just as advocates for this application, but as individuals committed to creating spaces where every voice mattered and every story was celebrated. They asked Members to imagine a young person visiting the City of London for the first time and feeling like an outsider, then stepping into Holland House, a vibrant cultural hub where they saw themselves reflected in the exhibitions, stories and workshops and finding reassurance in a space that whispered ‘you belong here’. Slowly their confidence would grow as they began to envision a future where they too could contribute to the City's legacy. Holland House was more than a building. It integrated the Museum of Diversity into the

City of London's fabric, forming a cultural hub that improvised underrepresented narratives and fostered connections. This renovation was vital to transforming the City's identity from a place once defined by its walls to one celebrated for inclusivity and cultural vibrancy.

Mr Richards stated the impact of the Museum of Diversity being in Holland House had been significant from initiatives such as the virtual reality museum collaborations with local schools and universities, as well as the project for the Commonwealth Secretariat that has reached over 2 million people globally. Events hosted at Holland House included art showcases, music performances and educational forums which engaged the community and deepened impact. Mr Richards added that this renovation would provide the permanent space needed to expand programmes, grow the museum and position London as a global cultural leader. Economically, this project would draw new visitors, boost tourism and support local businesses while redefining public spaces as inclusive and dynamic. This application was not just about renovating the building, it was about investing in London's future by supporting this project to ensure that this historic space became a vibrant cultural hub where diverse voices were celebrated and every individual felt they had a place in the story of the City.

Tessa Sanderson, CBE stated she had competed in six consecutive Olympic Games from 1976 to 1996, winning gold in 1984. She informed Members that forty years ago, she achieved the dream of Olympic gold becoming the first and only British athlete to win gold in a throwing event but she did not do it alone. It was the belief and support of key individuals that made it possible. She was speaking as an ambassador for the Museum of Diversity because hope and an opportunity was given to her and she was committed to sharing stories like hers which inspired, empowered and reflected the resilience and richness of communities.

The Deputy Chairman sought an explanation for how the lunar transit study was carried out, how it was validated and whether it had received a third-party expert review. A supporter stated the study was carried out by Dr. Axel Jacobs who had a PhD in light and lighting and it was reviewed by Dr Ticleanu, the Head of Lighting at the BRE. The supporter added that the information that had been used to undertake the calculations was publicly available and had been entirely peer-reviewed from both a technical side and through the onsite measurements.

The Deputy Chairman cited the support of staff to users in the community space that was frequently mentioned in letters in support of the application and asked, if the scheme was consented, whether the support would be continued and, if so, could details be provided of that. A supporter stated a lot of time had been spent talking to organisations about the requirements and the demand was significant already. He added that the plan was to offer the service, space and opportunities in perpetuity of the life of the asset and there was a number of supporters in attendance that had been heard from. The supporter further stated he would happily talk about some of the others who had used the space and would use the space continuously.

A Member stated the number of voluntary and community-sector organisations that had been engaged was interesting and questioned how many children and families from the Aldgate School had been engaged in the programme. The supporter responded that the Aldgate School had not been engaged and they had not used the space, but they had gone to schools across London rather than just specifically local. The supporter stated they had spoken to Canon Barnett Primary School and they had used the space quite a bit.

The Member also asked whether the St. Botolph's Aldgate Centre had been engaged and St. Joseph's Centre for Dignified Work. The Member added that the new Aldgate Centre was hiring a space at nearly £1,000 a day to keep the lights on. The supporter stated that the documentation clearly described who the developer had been able to consult with and were not sure they had consulted with the two organisations referred to.

A Member asked the applicants to address the issues of reflective light and the assertion made by an objector that the availability of light would plummet. A supporter responded that the studies undertaken had considered reflective light and the point had been made that they may not have considered sunlit reflected light off the back of the Courtyard. The supporter added that the skies in the UK were mostly cloudy, so sunlight proportion was about a third of the day and of that the third, the tower would only block a small portion which had been tested using the BRE methodology. The supporter further stated that the impact was determined to the negligible and the total sum of it meant that there would be an effect, but overall then changes had been considered to be minor.

The Member queried further on the use of the word 'plummet' by an objector. The supporter told Members that there were changes occurring all the time, every day and at different hours depending on things such as external obstructions, the height of the sun in the sky, cloudiness, and haziness. The supporter suggested the word 'plummet' was used to determine what was a temporary effect and the fact that if the tower blocked the passage of the sun, the light could not reflect back into the synagogue and, for a period of time, the light levels would drop. The supporter added that the studies of daylight ran for an entire year and the resulting studies which determined the significance of an effect were judged on balance throughout the whole year and not on a specific instance in a day.

A Member sought an explanation to understand the context of the application, as it was rejected in 2021, and of the developer's relationship with the synagogue as she did not understand how, after all those years, the relationship seemed to be in the same place with the whole Jewish community not in support of the application, especially as the paper said there was an intention to continue engaging with the Bevis Marks Synagogue. A supporter explained that their relationship with the Synagogue started around four and a half years ago in the original application where the very first meeting, in advance of the meeting with City Officers, had been with representatives of the Synagogue. The supporter added that the relationship continued all the way up to the application being submitted, the application going through consultation,

until a month later a number of objections had been received. The supporter stated he felt that it showed during the first application that, even though the application was refused, he continued the dialogue. He further noted that he told the first person he spoke to from the synagogue, who was not part of the current team, that he wanted to create an opportunity where they could work together and there were a number of official and unofficial meetings. The supporter also stated he had met with a number of people in attendance and had got to a point where they tried to reach a neighbourly agreement, as the developer was on one side with the space and the neighbour to the developer past the Valiant House was the Synagogue. The supporter told the Sub-Committee that they had tried to get to a point of agreement between the developer and the Synagogue which he believed was discussed at a trustee meeting and it was not agreed to. He further added that since that point, he had tried to keep the dialogue open and it would be fair to say that he and the Synagogue had not spoken this year other than one meeting on 13 November where he spoke with representatives of the synagogue, with the subject relating to the moon, daylight and sunlight. The applicant told the Sub-Committee that he, without a doubt, had kept a connection with the Synagogue and a lot of their consultants and apologised for having not reached a point of agreement.

The Member also asked if there was anyone on the development team who was an expert, or consultant, who understood the Jewish faith. The supporter stated that they did not have anyone sitting in the team who was an expert of the Jewish faith and felt that all the material provided by Bevis Marks Synagogue and their team, including talks and YouTube videos, had been helpful for the applicant side, as well as Members and Officers, to understand concerns and work out how to apply empirical analysis and methodologies and understand the impact from an empirical and numerical sense. The supporter added it was for Officers and Members to appreciate Bevis Marks Synagogue's concerns and consider whether they were empirical data impacts and what impact it would have on the ability to worship.

The Member also queried a detailed explanation as to what the benefits were, weighted proportionately to the lighting with the Synagogue, as it seemed that some of the benefits could be done without a new development. The Member in response to clarification from supporters on the question stated they were referring to the benefits in relation to the Section 106 funding and within the application as the Sub-Committee had been told they were quite remarkable and, whilst a lot of the things were included were good, they were not necessarily out of the ordinary. The Member added they wanted an explanation as to why they were exceptional benefits.

A supporter explained, in terms of the public benefits package weighed against the heritage harm and overall harms of the scheme, and the uniqueness would be relevant to the weight attributed to the benefit and made reference to a previous application where a classroom in the sky was presented as a 'unique' offer when there were already other classrooms in the sky. The supporter stated, in that sense, that they would not say it was unique, but that there were unique features about the overall package of benefits. The supporter added that one of the unique features was the degree of testing of the public use in

advance which meant that the individual spaces within Holland House and Creechurch Hall that were proposed responded to the engagement that had happened. A supporter indicated that three-on-three basketball, a classroom and an immersive space gallery had fed into the overall broad package of public benefits that would be unique in one sense, but not a single unique benefit.

The Member questioned how long the fabric of the building would last and how long the benefits would be locked in for. The supporter explained that buildings were now designed to a minimum of 60 years and that was linked to the design whole life cycle carbon and the building had been designed to be a loose-fit if it needed to be upgraded. However, the supporter indicated that there was no intention of the building being designed to be demolished, although it had to be as part of due process and expected the building to be there in perpetuity.

A Member stated it was brilliant to hear the space was currently being used by a number of organisations, including the Halls for Jumuah and Museum of Diversity, and sought confirmation that if the application was refused, the organisations would be able to continue using the space. The supporter told the Sub-Committee that in regard to the economics of the building, it was fair to say that there was a point in time where they would have to think of something different if there was a refusal. The supporter added that they had agreed, in the short-term, to three months of use by a number of individuals, whether it was sports or the Museum of Diversity. The applicant stated they needed to manage an economic position and he would have an empty building, which had been kept empty for the case, and he had made that investment and decision to deliver. The supporter further added that what they had been able to do was have a vast list of individuals doing different things within the space, so it was a decision from an economics perspective.

The Member queried why none of the presentation was about the building and whether there was a reason none of the 10 minutes had been used to tackle some of the points made by the Objectors. The supporter explained the reason they only spoke about the social benefits was because he felt the Officer's report had said everything and set out all the key parts of the economic and sustainability aspects. The supporter noted he was quite happy to answer any questions on other parts of the application.

Another Member told the Sub-Committee that everyone had to accept that the community of Bevis Marks believed that the building would severely damage their ability, if not completely stop, to worship in the Synagogue. The Member added that was the Synagogue's view of it and felt everyone needed to accept that. The Member added that it was difficult for them to understand how it could be suggested that the benefits that were applied to other people could, in some way, offset the damage done to another community as it should not be a competition between groups of who gets the benefit. The Member further stated that they found it unseemly that the supporter was trying to use the benefits to justify the damage that the Jewish community believed was going to be done. The supporter stated it was difficult to answer as to whether they accepted the damage that was referred to by an Objector and they had listened to the

Objectors, considered and talked to try to understand. The supporter indicated that they were not religious and could not walk into the Synagogue and respond to what an objector had said, but they could say that they had been through, with their team, a way to find a path of understanding to use empirical and technical information to try to understand what the concern was. The applicant told the Sub-Committee they believed they had done everything they could and had got a point where there was no harm.

The Member questioned why the benefits were predicated on a building whose design would damage the light into the synagogue and why a building could not be designed that did not cause the damage but still contained the benefits. The supporter explained it was related to the economics and partly to do with the opportunity to use Holland House as a community space as there was a certain element of work that needed to be done to connect Holland House, Renown House and Bury House and Bury House was, at present, effectively acting as the host. The supporter added that host provided an upgrade from a DDA and fire perspective, as well as a sustainability answer to the heritage and the tower itself would deliver not only the offices, but was delivering a response to the listed building issue. The supporter told the Sub-Committee that it was necessary to have the two working together and the reason for the height and shape of the building was related to the second reason of the previous application.

A Member noted they were on the Sub-Committee when the developer last brought a scheme for approval and recalled the scheme was refused mainly due to the adverse impact on the Grade One setting of St. Bevis Mark's Synagogue, its overbearing and overshadowing impact of the development on the courtyard of the Synagogue which was contrary to the protection of the setting of listed buildings, and the adverse effect on the setting of the Tower of London world heritage site. The Member stated that they could see the applicant had amended the scheme to try to limit the impact on the World Heritage Site, they struggled to see how the scheme had been amended to overcome the grounds that it was initially refused on in relation to the overbearing and overshadowing impact. The Member added those grounds for refusal were not completely captured in the refusal note and there were other grounds raised such as Holland House as they had raised the impact on the Grade Two-listed Holland House themselves. A supporter confirmed the Member was correct, stated there were a very clear two reasons for refusal and told the Sub-Committee that led to a response to change the massing and tried to reduce harm to both assets in key views and increase the public benefits. Another supporter stated that in relation to the perception of the overbearing impact from the courtyard of the synagogue and the effects of the setting on the Synagogue, the building had been reduced in height quite visibly, with the massing on top also reduced, so when one entered the courtyard, as seen in the presentation, one would see most of the building but as one moved around the courtyard, less of it would be seen. The supporter added that in all cases, the Synagogue would be very close and present in the foreground and, in order to see the building from many spots in the courtyard, one would need to crank their neck, and a video had been provided to prove that. It was further stated by the supporter that tall buildings were already visible, and it was part of the

character of the Synagogue. In relation to the Tower of London, the supporter explained that there was clearly a reduction in height and that the proposal would maintain the gap that already existed in the view from the northern bastion of Tower Bridge between Heron Plaza and the White Tower.

The Member outlined that they realised Holland House needed to have some work done around the façade and queried why that had not been done to protect the historic building as they would have thought it would be one of the developer's priorities to preserve the current historic building of Holland House and ensure it was repaired and safe. A supporter stated they had spent quite a bit of time and money going through the structural elements and the safety of the façade, which continued to be monitored, and had carried out what was required for that particular façade.

The Member also raised the issue of the community space and noted a few months ago that the Sub-Committee granted the whole of Writers House as part of a community space for the Clare House development and there was another development at Bishopsgate near Liverpool Street Station that included two floors of community flexible space. The Member further noted the Sub-Committee had granted a classroom in the sky in the previous application and asked why the developer felt that their community offering was needed in addition to what had already been granted, why it was different and why it was a benefit. The Member stated that there was plenty of space in the City of London for community groups, who were always welcome and, if the development did not go ahead, space could be found for those already using the space. The Member asked the developer to outline the benefits as a lot of these would be encapsulated in any development there that could be designed to not overshadow or overbear on the Grade One-listed St. Bevis Marks Synagogue. A supporter stated that, in terms of benefits, the uniqueness of what they had done was the testing by thousands of users who had used the space and had said that was where the demand was. The supporter added that they understood the point made and that there were already consents for more space, but felt that demand outstripped supply now and would do so in the future. The supporter told the Sub-Committee that another point relating to the overall uniqueness of the scheme was that the offer was in perpetuity as other similar offers were usually aimed at a specific tenant which then fell away and required a new tenant to be found.

The Chairman moved the discussion to Members questions to Officers.

The Chairman sought to clarify some of the emotive points against the factual points and stated a need to get clear bandwidth between the two to ensure decisions were made in line with planning policy.

The Chairman noted there was reference to the fact that Historic England would not grant consent for Holland House off the back of what had been proposed and sought some clarification of the situation from Officers and where the conservation was going as it was a very clear statement they would not grant it. Officers responded that Historic England could not grant Listed Building Consent themselves as they were not a decision-making body. However, as set

out in the report, they did have the power of direction over listed buildings, including the ability to direct refusal of certain building consents, direct the imposition of conditions on consents or allow the Local Authority to determine as it saw fit. Officers added that in this case, they had objected to the scheme and have no issued their direction which, until such a direction had been received, meant that a Listed Building Consent decision could not be issued. Officers confirmed that Historic England were awaiting the Sub-Committee's decision before they decided what to do.

The Chairman also sought an answer on a point made by objectors regarding an assertion of the Sub-Committee being antisemitic, breaching human rights or being discriminatory as they were matters of law and not matters of opinion. He asked Officers for clarification that the Sub-Committee was on solid ground to make its decisions and that the reports that had been provided were not falling into the aforementioned categories. Officers responded that they could give absolute assurance that they were satisfied there had been a thorough assessment on the equality impact of the development and granting permission would not breach the public sector equality duty and the report before the Sub-Committee contained a thorough assessment of the complex equality impact of the application at an unprecedented level and the approach to equality impact was also reviewed by a third party, which was also unique and unprecedented, and was subject to internal and external legal scrutiny. Officers accepted it was a difficult situation for everyone in the room, but the suggestions that the Officers' conclusions were discriminatory or antisemitic were offensive with regard to their integrity. Officers underlined that they operated with professionalism, were objective and acted with integrity and impartiality. He added, above all, they were sensitive and respectful to all communities.

The Chairman asked Officers to inform the Sub-Committee on their confidence, or lack thereof, in the daylight and sunlight reports. Officers explained they had based their assessment on the data that was presented by the applicant which was based on the standards of the industry under BRE guidance, and the assessment had been third party reviewed. Officers told Members that they had considered the previous impact of the previously proposed development in comparison to the current development and that comparison had also been reviewed as well following the submission of the Bevis Marks Synagogue's daylight study which had also been third party reviewed. Officers stated they were confident that the conclusions in the report regarding impact on daylight and sunlight had been robustly assessed.

The Deputy Chairman queried whether the provision of the Hub and the auditorium space with suitable support staff for users would be conditioned and could not be withdrawn if the application was granted and implemented. Officers confirmed there was a condition securing the provision of them and would also secure the provision of them in perpetuity of the development via a Section 106 obligations. Officers added that they had included an implementation strategy for the cultural, education, sports and community spaces via Section 106 obligations, as well as a management plan for those uses to secure Creechurch Hall and Holland House Hub.

The Deputy Chairman also noted that the proposed tower was very close to the Synagogue and asked whether the City had any other consented or implemented towers in the City that were comparably near to sensitive buildings and locations. Officers explained the proposal was in the City Cluster area where ancient and hyper modern office buildings were seen in close juxtaposition such as St. Ethelburga's and 100 Bishopsgate, St. Andrew Undershaft and the Undershaft proposals that were discussed earlier in the meeting, and 22 Bishopsgate and St. Helen' Church. Officers added they were the kind of juxtapositions that most acutely embodied the City's living traditions as a modern financial centre with ancient roots and were part of its DNA. Officers further stated that if one took that as the starting point, then it followed that dynamic change, such as that of the proposal, was not necessarily harmful in principle or against the grain of the place. Officers further noted that they negotiated schemes to achieve respectful and appropriate relationships with heritage assets in the Cluster and the proposals were an example of this in its relationships with the various heritage assets in the locality. Officers maintained that the proposals were entirely in keeping with the character of the Cluster.

The Deputy Chairman also asked Officers to confirm their satisfaction with the lunar study and the BRE validation of it. Officers responded that their assessment had been based on data that was provided by the applicant and, after third party review by BRE, had accepted as stated in the report that there would be a reduction in terms of hours that the moon would be visible. However, as said during the presentation, the number of months that the moon would be visible would not be reduced when compared to the future baseline which reduced the number of months that the moon was visible by one month, but this was due to 100 Leadenhall. Officers directed Members to Page 1005 and stated that was where the tables set out the number of hours, number of days, and number of months that the moon would be visible.

The Deputy Chairman also questioned whether World Heritage was a material consideration that the Sub-Committee needed to consider. Officers confirmed that the World Heritage Site was a material consideration, and the City had a duty to preserve it.

A Member informed the Sub-Committee they too were offended by references to the Equality Act, and particularly antisemitism as, while they were not Jewish, they were a great supporter of Israel. However, this was a planning application, and they stated they were trying to limit their reasoning to planning considerations. The Member asked whether the named Acts were valid reasons to take into account when making the planning decision. Officers indicated they understood the question to be whether the Equalities Act and the Human Rights Act were material considerations in respect of the Sub-Committee's decisions and confirmed that they were. Officers noted that the report set out a thorough assessment of how the public sector equality duty applied and what they believed the impact would be. Officers also added that the report also went through what was considered to be the human rights balance and the implications for that.

The Member also queried if there was provision for public toilets that were accessible and not just those using the building as they had gone through the papers and could not find reference to it. Officers indicated they had considered the provision of changing place facilities and public toilets and confirmed they had imposed Condition 55 on Page 1112 that required the submission of details for a Changing Place, wheelchair accessibility, ambulant accessible toilet, baby changing facilities at the ground floor and associated signs to ensure that people could be directed to those facilities. Officers added they had also secured, through planning obligation, the management of the facilities.

Another Member noted that a year ago, the Sub-Committee voted unanimously to create the Creechurch Conservation Area and questioned why it would be ignored a year later in its first test. Officers explained that it had been fully assessed in the Officer report and summarised from the report that many of the viewing experiences in the Conservation Area did have the towers of the Cluster as its backdrop and, in many of the views, the proposed tall building would be seen above the low-rise Conservation Area buildings as part of the existing high-rise backdrop more associated with the Cluster above than the Creechurch Conservation Area below. Officers added that from the views where the Tower would be seen coming to ground, such as Mitre Street and Creechurch Lane, it would appear as a contrast in scale with the Conservation Area buildings. However, in the Creechurch Conservation Area proposal approved by the Planning and Transportation Committee, one of the identified attributes of the Conservation Area Special Interest was the juxtaposition in scale between buildings. Officers further stated in this sense, the proposal would not be a departure from the qualities identified in the formal designation of the conservation area.

The Member also stated that they understood that the heritage statutory consultees believed that some harm would be caused to the Synagogue and the Tower of London and questioned what the point of the consultation was in the first place if the Sub-Committee was not going to listen to heritage consultees. Officers responded, in relation to a previous point made about the character of the City Cluster, that if one took the established dynamic as the starting point, it followed that the proposal was not necessarily harmful in principle or against the grain of the place and, with that in mind, Officers sometimes arrive at different conclusions to Historic England and other bodies who seemed to begin from a different position. Officers added it was worth noting that there were many instances where Officers accorded with the views of objectors and the planning system allowed for a plurality of approaches.

A Member noted that the report had stated that there would not be any material impact to carry out religious practices, including circumcision, but then on Paragraph 430 went on to state that Officers did not profess expertise in the areas of religious history and practices. The Member stated that the Rabbi and one of the objections had said there would be an impact on circumcision and questioned what experts Officers had consulted with from the Jewish community as there were two different answers being received. The Member also asked for an explanation for the methodology and raised an example that if an organisation had people who were partially blind, would they be taken into

consideration or was it a generic methodology that was applied to the lighting. Officers stated they were not religious experts, but had assessed the daylight levels from the data provided by the applicant, which had also been third party reviewed, and the impacts identified within the interior of the Synagogue were minor adverse and, therefore, were not considered to be significant. Officers, for that reason, still considered that the Synagogue would be able to operate as a place of worship and carry out all religious ceremonies. Officers added, in regard to the daylight assessment, that the industry standards were to submit information around daylight and sunlight guidance based on the BRE guidance and that was what the applicant had submitted. Officers also noted that the applicant had prepared a radiance assessment which showed the light levels within the interior of a room, they were standard practice, accepted by local authorities and that is what Officers had assessed. Officers further stated they had the assessments third-party assessed by BRE and they had accepted and agreed with the impacts identified in those assessments. Officers further added that the impact on the interior, in relation to daylight and sunlight, of the Synagogue was not a reason for refusal last time and the previous refusal was related to the overshadowing and overbearing impact on the courtyard.

Another Member stated equality impact was the focus of what was being looked at and it was a concern that, during the course of the Sub-Committee meeting, it was having to seek to understand whether or not we had to apply the equality impact to the decision-making. The Member told the Sub-Committee the public sector equality duty absolutely had to be considered, and it was in the papers. The Member noted that the papers were the longest and most difficult to follow they had ever experienced and requested a drawing to attention of the key points that Members needed to take into consideration in relation to equality impact. The Member added that they understood it to be that it was not necessarily about having an impact, but the impact being disproportionate and stated the least the Sub-Committee could do was take the application as seriously as it could. The Member drew attention to Page 441 where the public sector equality duty was referenced and felt it would assist the Sub-Committee if that was at the forefront of its mind. Officers stated they would read out Section 149 as there was a danger that if they tried to summarise what had been identified as the main equality impacts, that would leave something out and could bring things into question. Officers added that there was an equalities impact assessment itself and Members were required to take that into account, but a lot of comments had also come through consultation as well and that, and what had been heard at the meeting, all formed part of the equalities information that was in front of Members which they would need to take a view on. Officers read out the following in Section 149 of the Equality Act 2010: the City as a Public Authority must, in the exercise of its function, have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that was prohibited under the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Officers read out Section 149.3 of the Equality Act: that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not

share it involves having due regard, in particular, to the need to remove and minimise disadvantages suffered by persons who shared a relevant protected characteristic that are not connected to that characteristic; to take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; to encourage persons who share a relevant characteristic to participate in public life or in any other activity in which participation by such persons was disproportionately low. Officers added they also set out what the protected characteristics, which were: age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Officers further stated that public authorities also needed to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. Another Officer added that it did not just stop there as there was a thread throughout the entire report that looked at every single impact through those lenses and would not accept that the report was incoherent or unstructured and felt it was one of the best reports that had ever been drafted by the City.

The Member clarified that they did not mean they were referring to the quality of the report itself, but was referring to the way it had been received and stated they would be very surprised if other Members did not feel that receiving bits and pieces of the report had made it slightly more difficult to read and appreciated that may not have been an issue for Officers but felt it was important for the Sub-Committee to have that drawn to its attention. Officers stated that they read the Member's comments to suggest they had underplayed equalities obligations in the report. The Member confirmed that was not the case and stated there were different views at to where the balance was, but it had been difficult to get everything in one place and to understand everything in a way that would be helpful. The Member suggested it would be helpful to have a SharePoint site where all the papers could be viewed.

The Member sought confirmation that the full redevelopment option, which been had been selected, rather than the refurbishment option produced three times the whole life carbon emissions. Officers explained there were four options in the optioneering study and the redevelopment option had 56m tonnes of carbon emissions while the simple refurbishment option was only 15m tonnes, so it was more than three times as much. They added that Options Two and Three, which were also refurbishment with some extensions, were slightly higher in carbon, but were less than the redevelopment option and that was set out in the carbon option table in the report.

The Member asked, in relation to the refused scheme, whether the fact of refusal and the reasons given were a material consideration for the Sub-Committee. Officers confirmed that the reasons for refusal were a material planning consideration.

The Member also queried, in relation to the comparing of the refused scheme and current scheme from the applicant's presentation, that the difference between the two was described as absolutely minimal and were virtually identical in relation to the level of light. Officers clarified that the daylight levels

were relatively comparable and, in relation to sunlight effects, the proposed scheme represented a small improvement in comparison to the refused scheme.

The Chairman moved the meeting to a debate.

A Member indicated they wanted to discuss the balance of public and commercial benefits of the applications by referring to a previous scheme for the Synagogue in 2020. The Member stated that the earlier scheme, which was almost completed, involved demolishing and then rebuilding a single level annex building against the south wall of the Synagogue. The Member added that the project could have been stopped at the demolition stage, which would've added space to the courtyard, and that was how Members saw the site when they visited a few years ago prior to the last application where the old annex had gone and there was a concrete pad in the courtyard. The Member stated further that had the application been stopped at that point, it would have restored the Synagogue to what it was in 1925. However, that was not what happened. The Member told the Sub-Committee that a new annex was built with the same proportions to the previous one with the addition of an access ramp and a ticket office, and it would become a visitor centre with a café, shop, meeting rooms and exhibition spaces. The Member added that the disbenefits of the scheme, which was almost complete, had a reduction of natural light in the Synagogue because the ground floor windows on the south side continued to be internal windows, not external windows as they were in 1925 and there was a loss of a possibility of having a courtyard that was 30% larger. The Member indicated that had that scheme come to the Committee, he would have supported it as they felt the benefits of St. Bevis Mark's having a visitor centre would have outweighed the negatives, but Members did not get an opportunity to consider the application because there were no objections at all and it was decided by Officers under the Scheme of Delegations and he believed the Officers were right that time. The Member concluded that the same reasons for weighing up the loss of light and decrease in size of the courtyard, even thought the courtyard was not changing on this occasion, were the same issue on this occasion and expressed his support for the Officers.

Another Member addressed the Sub-Committee and stated the application before it was materially the same as the previous one the Sub-Committee had rejected citing the harm it would cause and, three years later, there was a stronger case to reject the application as the establishment of a Conservation Area, with the policy recommending refusal of tall buildings within inappropriate areas, including Conservation Areas, and if a tall building was to be granted, it should enhance the Conservation Area. The Member added that, as heard from the report, the harm would be caused and not enhance, and the scheme would result in heritage harm to the buildings, as well as to an existing community with deep connections to the location dating back hundreds of years. The Member stated that the benefits from the applications were temporary in comparison and were hardly unique, special or proportionate to justify the harm and it was not necessary to do this to unlock the benefits. The Member further added that the Officer's report acknowledged that they did not have an expertise in the area of religious history and practice, and yet Members were told the

application would not impact on the religious practices when Members were hearing from the Jewish community unequivocally that it would impact their freedom to worship. The Member further stated that it was hardly a development that was promoting inclusivity and accessibility, and indicated she would vote against the application and urged other Members of the Sub-Committee to do so as the application, like the previous scheme, would cause significant harm which could not be outweighed by any benefit of the development as it would cause irreversible damage to religious worship which had taken place on the site for hundreds of years. The Member concluded the application was materially the same as the one previously rejected by the Sub-Committee, particularly in relation to the harm caused, and it was essential that the Sub-Committee remain consistent in its opposition as a result and she would vote against the application.

A Member stated they were in favour of development, were sometimes in favour of taller buildings if they were right and every time the Sub-Committee made a decision of this nature, it was on balance. The Member indicated they would vote against the application as it crossed too much red lines, particularly relating to the Local Plan and heritage considerations.

The Deputy Chairman addressed the Sub-Committee and stated it was a difficult application to decide on as there was clearly harm to the Synagogue which would be caused to the development if consented and it had attracted a large volume of persuasive and passionate objections. He stated that the Synagogue was a wonderful asset in the City and all wanted to it to continue to flourish and thrive in the future, but there were a large number of significant benefits that the application, if consented, would bring such as the 34,000sqm of Grade A office space and CIL payments of around £10m, affordable housing contributions and the enhancements to the Grade Two-listed Holland House which the Deputy Chairman indicated were very positive. However, he stated it was the multifunctional auditorium space and the Holland House hub together, which would provide 1,400sqm of free to use space for the majority of the week, which was the unique office offer and the variety of groups that had successfully been using the community space was impressive, including museums, religious groups, art organisations, educational establishments and the London Fire Brigade. The Deputy Chairman further added that the community offering was exceptional and was clearly highly valued by those who had used it and, on balance, believed that the benefits of the application did outweigh the harm. The Deputy Chairman stated he would support the Officer recommendations.

A Member indicated they wanted to come back on some points made by a Member earlier in the debate in regard to the visitor centre next to the Synagogue and noted when they visited the Synagogue, they could clearly see that the visitor centre was a single level building with a glass roof, so the light was getting into the visitor centre and was not obscuring the windows at all. The Member told the Sub-Committee she could see that the developer had tried to improve the public benefit as the public benefit did not outweigh the detrimental harm done to the Synagogue and the World Heritage Site last time. The Member added that, whilst she believed the applicant had done their best,

they believed the harm may have been impounded by the proposal to increase the floors on Holland House which was a Grade II-listed unique building and the only building to have been constructed during the First World War which for her was another negative impact on a listed building. The Member further stated that the Tower of London as a World Heritage Site really was unique and was why it had that status, so while the height might have dropped down slightly, it was still very clear in those visuals of the impact toward White Tower and deflected from the site of White Tower across towards the Cluster and felt that was a very negative impact on the World Heritage Site. The Member, in reference to the Bevis Marks Synagogue, told the Sub-Committee that they had asked to see the light slide of the previous scheme that had been refused versus the proposed scheme and noted that Officers had confirmed in the meeting that there was no difference in the lighting between the refused scheme and the proposed scheme. The Member added that, having visited the Synagogue again, it was a very unique location, and it would be really overshadowed and impacted in her view. The Member further stated that the Synagogue was unique to the City of London and the country and believed that it deserved protection, as the City's policies stated, and felt that she would approve a scheme that was designed to minimise the impacts on the Synagogue and the World Heritage Site. The Member added that there were other spaces in the City of London which were granted a number of community spaces and the City was not lacking in those, and not to the point where the Sub-Committee would agree a scheme that would irreversibly damage the Synagogue and the World Heritage Site. The Member concluded that she would not approve the scheme.

Another Member addressed the Sub-Committee and stated their first point was in relation to the impact that Historic England had highlighted and noted they had previously supported applications that filled in the Cluster, including the application that had come before the Sub-Committee earlier in the meeting. The Member stated, however, that if one looked at View 23, one could see that the development popped up, not as a shoulder of the Cluster, but as if another Cluster was being started and was a very substantial addition and did not read as part of the existing Cluster. The Member added, secondly, that when one turned to View 45a, and referred to a comment made earlier in reference to need to crack your neck to view the building, that was not the case, it could be seen as soon as one walked into the courtyard and the dominant thing in that courtyard would be the building. The Member told the Sub-Committee he could not see how it possibly protected or enhanced the Conservation Area and did not see how it possibly helped the setting of a Grade I-listed building. The Member, referring to the new NPPF framework, highlighted paragraph 212 that stated: when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The Member stated that was the new instruction and did not see how the Sub-Committee could possibly approve the application with that instruction. The Member also raised the issue of sunlight and overshadowing, which referred to Page 203 of the presentation pack which had the indoor daylight luminance

study shown, and indicated he could not figure out which of the numbers were supposed to be used as it seemed to be two numbers for the balcony, but whichever numbers were used, there was a 30% reduction in an already lower level and, in particular, the balcony was where women worshipped and would have a particular impact on them. The Member concluded, with reference to the lunar studies, that they did not understand the concept of counting the months and the fact was that people had to go out and worship on a monthly basis if they could, and to tell them they had a 15-minute window to possibly do it on a particular day was not telling them that they could do it. The Member suggested it was trying to explain Judaism to Jewish people which did not strike him as a helpful thing for anyone to be trying to do. The Member concluded that, for the aforementioned reasons, they would reject the application.

A Member addressed the Sub-Committee and stated he had been present for the original rejection and remained fairly convinced by the Officers, and had been reassured by them, that the development would not adversely affect the Synagogue as a place of worship. The Member added that they had been reassured by the Officers that it did meet the primary requirements for daylight and not adversely affecting daylight, and the applicants had made significant changes to the tower, specifically the shape and scale of it, in such a way that met the objections from both the Tower of London and from inside the Synagogue. The Member noted on the other hand that the Rabbi and the Jewish community were all saying it would adversely affect, or to some extent, render worship unworkable in the Synagogue and reduce it to being no more than a tourist attraction. The Member further added that there were two very strong arguments on both sides and could see it was going to be very challenging for the Sub-Committee to reach a fair and equitable decision. The Member concluded that it would have to be voted on and he intended to vote in favour of the application.

Another Member addressed the Sub-Committee and referred to a previous point made by a Member that the Officers said it would not affect worship in the Synagogue. The Member stated that Officers had confirmed, in response to another question, that they were no experts and the congregation obviously disagreed with that assessment. The Member added that if the Sub-Committee valued The Hub which seemed to be doing lovely work, there was no reason why it could not look for it in any other development and the Sub-Committee could demand it of the developer if they came back to Sub-Committee on a different site. The Member told the Sub-Committee that, as a previous Member had stated, all the heritage groups were against the proposal and the previous, and current, Members of Parliament was against the proposal. The Member further added that the proximity, the overshadowing and the overbearing nature of the development did affect the setting of the Synagogue which was important to the congregation. The Member further stated they did not believe that was acceptable and concluded they could not support the application.

A Member stated that they felt all of the Members felt that it was a difficult position for the Sub-Committee to be in and no one liked to have to make such decisions, but Members were elected to do so and it was interesting that planning applications came down to the passage of the sun and, indeed, in this

case the passage of the moon. The Member added that there was the added complexity of a heritage asset near the site, as well as the complexity of religion in the mix too and, to a certain extent, Officers had been put in an extremely invidious position of having to somehow make tangible the intangible which was at the heart of the challenge that Members had. The Member told the Sub-Committee that there was a developer who wanted to build a large building and had brought the scale of that back from a rejected application and the Sub-Committee were being told that the economics of that were required in order to continue what appeared to be a really worthwhile and valuable community space. The Member further added, as an aside, that they felt slightly uncomfortable at feeling like the Sub-Committee was being pitted between two different sets of communities within the City during the early presentations, but that was to be put to one side. The Member stated that on one hand were friends in the Jewish community whose voices the Sub-Committee was listening to who had heard what had been said, and echoed another Member's comments that it was unfortunate that the timing of the meeting was today on Shabbat. The Member further added that, having read through the pack and listened to the comments, they wanted to address a previous point by another Member as, when Members said the Officers had to be an expert in absolutely everything, including religion, he did not believe that was necessarily true and felt what was important was that Officers used the metrics and benchmarks that were available to them. The Member told the Sub-Committee that they had heard, with regard to the lunar transit, that Officers had done that and they could not be asked to be experts on the divine and did not think that would be reasonable as it was a part of town that needed a revamp and where development was needed and the economic benefit did need to be yielded that the site would bring. The Member concluded that, in recognition of the public benefit and trading that off against what they thought was indeed concern from a very valuable minority community here in the City who it desperately wanted to protect and look after, in their view they would support the application as he felt that the Officers had made a very difficult, but correct decision.

Another Member stated they believed that the Sub-Committee was working on the basis that it was an application being treated on its merits and not as a show of loyalty to anyone in particular. The Member added that the use of benchmarks was important, and it was important to say where the limit of those benchmarks was and they felt the Sub-Committee was in unique territory with the application. The Member stated it was right to say that last time, planning Officers had recommended and the Sub-Committee refused the application and did so on grounds that had not changed in substance. The Member noted that the reason she had asked about the material planning consideration of the previous refusal was to ensure that everyone could understand there was a consistency in approach of the Sub-Committee and that certainty was important, whether one was more pro-growth than their approaches to the expansion of office space or not, for everyone. The Member added she was asking the question about the point of whether it had fundamentally changed in terms of light or harm to the Tower of London World Heritage Site, and, in her view, there was unjustified harm to the Tower of London World Heritage Site at a very sensitive time which was entirely in keeping with what had been said before. The Member further stated that if one looked at images 23 and 45a, it

was really instructive and showed one that it was highly visible and did draw the eye, and it was important to acknowledge that there was a real harm to the Synagogue which everyone agreed there would at least be some adverse effect to the Synagogue's light impact, particularly in the ladies gallery and in the courtyard. The Member further added that it diminished the quality of the space and the chipping away at the access to light and sunlight for the important and valuable Grade I-listed building did not justify the continue chipping away and was an example of why the stringent St. Paul's requirements on sightlines, that sometimes felt heavy-handed, were the only way to prevent it from taking place. The Member told the Sub-Committee that, on balance, there had not been a significant change in those aspects and hoped a broader conservation could be had with Officers about how the City used really valuable opportunities, in relation to meanwhile space, to infill them into spaces that have been used as a public benefit on a number of other applications as if those spaces were not suitable for some groups, then the City would have a broader issue. The Member confirmed they would not approve the application and would be refusing.

The Chairman indicated the Sub-Committee need to give credence to the fact that it had a responsibility to vote without fear or favour as had been pointed out at the last meeting and stated it was not to give any favouritism to any party to an application as the Sub-Committee had to make sure it was making decisions as independent Members. He told the Sub-Committee that an application had been looked at in the morning where an applicant had listened to their neighbours and come back with an improved scheme and he looked at the proposed scheme with the reduced massing, the reduced height and felt the applicant had listened, listened to their neighbours, engaged with the groups involved in the scheme and had come back with quite a different scheme. He stated there were some comparators around the tower, but when one considered the impact on Holland House and Renown House, it was a very different bulk altogether that had come forward for consideration. The Chairman added that the Sub-Committee had to remember that it may have subjective views on the impacts on the World Heritage Site, the heights and impacts on daylight and sunlight, but the scheme did fit within the Eastern Cluster and the tall buildings area that had been designated by Members, had been approved by the Planning and Transportation Committee and the Court of Common Council, and was now with the Planning Inspectorate. The Chairman further stated that the tall building fit within the tall building cluster and, objectively, fit within City policies which the Sub-Committee should bear in mind when it looked at the impact on the World Heritage Site. He further added, in relation to the community offering, that was interesting that competition was spoken about in reference to the Synagogue and the communities that had been heard from and felt there was not a competition and there was nothing stopping the Synagogue from carrying out its religious activities. The Chairman told the Sub-Committee that if he felt there was a real impact on the Synagogue being able to continue services, he would not be supporting the application, but he saw the other community groups coming in as a compliment to the area, not a competition, and that diversity of offering should be embraced. He added that there had been discussion about other community offerings in the Square Mile and knew for a fact there were hundred of museums and community groups

looking for a home, and it was not a nil-sum game. He stated that there were people requesting a cultural activation or a community offering in the new schemes coming up and there was certainly no shortage of community groups, but there was a shortage of space to accommodate them. The Chairman confirmed he would support the scheme and would do so on a balanced perspective that had taken into account all of the argument heard on both sides.

The Chairman moved the meeting to the vote.

The Town Clerk stated that Members were voting on Items 4 and 5 and the recommendations on Pages 565 to 566, and Page 1127 of the main agenda pack with any relevant amendments set out in the addendum packs. Members confirmed they were happy to proceed to the vote on that basis.

The Sub-Committee proceeded to vote on the recommendations before them.

Votes were cast as follows: IN FAVOUR – 8
OPPOSED – 14
There were no abstentions.

The recommendations were therefore not carried.

RESOLVED – That, planning permission not be granted for the above proposal.

The Chairman asked the Town Clerk to run through the process outlining reasons for refusal.

The Town Clerk stated the following: In line with the Planning Protocol, specifically Appendix A, subsection 2a, the Committee should indicate reasons for refusal with sufficient clarity to enable clear and precise reasons (with reference to relevant policies) to be provided in the Decision Notice. The Protocol provides for instances such as this where, although committee has indicated clear reasons, the precise wording (including relevant policies) cannot appropriately be framed in the forum of the committee meeting. In these cases, the drafting of precise reasons may be delegated to the Town Clerk (after consultation with the Chief Planning Officer and Development Director and the Chairman and Deputy Chairman).

The Chairman moved a Motion.

MOTION: Delegated Authority be granted to the Town Clerk, in consultation with the relevant Officers, the Chairman and the Deputy Chairman, to finalise the precise wording of the minutes and Decision Notice, to be drafted in line with these reasons for refusal.

The Deputy Chairman seconded the Motion.

The Chairman moved the meeting to a debate on the Motion.

A Member addressed the Sub-Committee and stated the importance of the reasons for refusal and the reliance upon them as a material consideration and expressed concern that they would only be viewed by those who recommended supporting the application. The Member stated that the reasons, from the last refusal, were related to the bulk and masing of the proposal regarding the effect on the setting and amenities of the Synagogue, the daylight and sunlight effect, and Historic England's concerns about the views of the Tower of London. The Member added that she believed the reasons for refusal should come back to the Sub-Committee due to the significance and it being a material consideration. The Chairman expressed concern about bringing it back to the Sub-Committee and wanted to get the reasons for refusal actioned as the Officers had listened.

Another Member addressed the Sub-Committee and stated that Officers would usually work up grounds for refusal which would come back to Sub-Committee as had been done last time the application had been discussed and then it was agreed. The Member stated this happened at every other Local Authority and it was not delegated to the Chairman and Deputy Chairman, who had voted for the application, to agree the grounds for refusal. The Member added there was another reason for refusal related to the negative impacts on the Grade II-listed Holland House and suggested it had to come back to Sub-Committee to be agreed. The Chairman responded that the reasons for refusal were issued by the Town Clerk, in consultation with the Director of Planning, the Chairman and the Deputy Chairman, and stated there was an Officer oversight.

A Member proposed an amendment to the Motion. that the reasons for refusal come back to the Sub-Committee for consideration after it had been drafted by Officers.

MOTION: That the reasons for refusal come back to the Sub-Committee for consideration and approval following drafting by Officers.

The Town Clerk stated, for the avoidance of doubt, that Members had before them a Motion put forward by the Chairman and seconded by the Deputy Chairman for the final terms of refusal to be delegated to the Town Clerk in consultation with the aforementioned Officers and the Chairman and Deputy Chairman. The Town Clerk understood that a Member had moved an amendment, that had been seconded, which would amend the Motion in such a way that it would require it to come back to the Sub-Committee. The Town Clerk added, in terms of procedure, that Members could either move the amendment and then vote on it or vote down the original Motion proposed by the Chairman.

The Chairman moved to a vote on the amendment to the Motion.

The Town Clerk confirmed that Members were being asked to vote on an amendment which require the precise terms of the refusal to come back to the Sub-Committee for approval rather than for a Delegated Authority.

The Sub-Committee proceeded to vote on the Motion before them.

Votes were cast as follows: IN FAVOUR – 13
OPPOSED – 7
There were no abstentions.

The Motion detailing the amendment to the prior Motion was therefore carried.

RESOLVED – That, the Motion was amended to read: The reasons for refusal were to return to the Sub-Committee for consideration and approval following drafting by Officers.

The Chairman moved to the vote on the amended Motion.

The Sub-Committee proceeded to vote on the Motion before them.

The Motion was carried.

RESOLVED – That, the reasons for refusal were to return to the Sub-Committee for consideration and approval following drafting by Officers.

6. *** VALID PLANNING APPLICATIONS RECEIVED BY THE ENVIRONMENT DEPARTMENT**

The Committee received a report which detailed development applications received by the Department of the Built Environment since the last meeting.

RESOLVED – That, Members noted the report.

7. *** DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Committee received a report which detailed development and advertisement applications determined by the Chief Planning Officer and the Development Director or those authorised under delegated powers since the last report to the meeting.

RESOLVED – That, Members noted the report.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions on matters relating to the work of the Sub-Committee.

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

The Chairman asked Officers to advise the Sub-Committee on the report on the new NPPF which would outline the changes and implications which was being prepared for Planning and Transportation Committee. Officers informed the Sub-Committee that a report would be going to Planning and Transportation

Committee setting out in detail the changes to the NPPF and how it impacted upon the work of the Committee.

The Chairman noted there had been a recent Government consultation document on planning committees and their structure and asked Officers to advise how the response would be drafted, and how the Committee would be involved. Officers stated that the report would be going to the Planning and Transportation Committee in January before it went to Policy & Resources Committee, and it would contain a draft response to the consultation about the workings of planning committees nationally.

The meeting ended at 2.33 pm

Chairman

Contact Officer: Callum Southern
Callum.Southern@cityoflondon.gov.uk

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Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Submitted via email to PLNComments@cityoflondon.gov.uk

FAO: Anna Tastsoglou, Planning Case Officer

Planning Application Ref: 24/00021/FULEIA

Re: Planning Consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Dear Anna,

The Eastern City and Aldgate Connect Business Improvement Districts (BIDs) are proud to be making a joint representation in relation to the above planning application.

The Eastern City BID was established in April 2022, and the Aldgate BID in April 2020 following a successful ballot of local eligible businesses, and are two of the five BIDs that operate across the Square Mile investing around £9m per year to deliver hyper-local enhancements and support their relevant communities. The City BIDs form part of the Primera portfolio of 12 central London BIDs. Each of the City BIDs are developing or have already developed their own public realm visions and strategies.

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

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

For clarity, it is not the role of the BIDs to explicitly support or oppose any specific planning application and this is not the purpose of this letter. Rather, we view aspects of the above application in relation to our published evidence base – namely our Public Realm Visions; Eastern City (2024) and Aldgate Connect (2022) – which are rooted in insight, data and consultation with our member businesses, key stakeholders and the public.

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

In the context of this growth, our public realm and the ‘spaces between the buildings’ are ever more important.

We are grateful to the developer for their consultation and positive engagement with the BIDs through the planning process. We have shared our Public Realm Visions with them and drawn specific attention to the development's strategic location at the intersection of the two BID areas, aligned with the project family routes set out in the document Eastern City Vision, and the nearby gateways to Aldgate, as well as identified heritage assets of Mitre Square and Devonshire Square. We would urge consideration of these priority areas in relation to the proposed development's wider context. In addition, the Eastern City Public Realm Vision outlines our seven key principles, which are:

- Welcoming publicly accessible spaces – designing spaces that are inviting and accommodating;
- Resilient trees and planting – ensuring the area is as green as possible;
- Lively uses and activity – creating a dynamic and energetic place;
- Intuitive navigation – making it easier to reach your destination;
- Historic character and lighting – celebrating and improving the heritage features;
- A mobility environment which is accessible to all – establishing environments where modes of movement can co-exist;
- A safe and secure neighbourhood – promoting spaces where all users feel safe.

Considering the above scheme against these principles, we welcome a number of provisions in the application and look forward to working with the developer should the scheme receive approval. Specifically, we wish to draw attention to the following aspects of this application, which support our outlined principles above;

- The creation of additional public realm at ground – a 172% increase from the current situation, including creation of a new pocket park space and arcade;
- Enhancing pedestrian experience through improved connection from Aldgate to Tower Hill in line with strategic project family;
- Consideration for weekend activation of spaces that are accessible to public and community, through proposed public space, retail offering and community/cultural use, and consideration for accessible and inclusive spaces such as proposal for 'changing places' facilities;
- Celebration of the historical context through retention of historic features of the built environment

Yours sincerely

Nick Carty

Chair, Eastern City BID

Liam Hayes

Chair, Aldgate Connect BID

Hackney Council
Planning Service
1 Hillman Street
London E8 1DY
www.hackney.gov.uk
Hackney Reference:2024/2229

Anna Tastsoglou
Po Box 270 Guildhall

London
EC2P 2EJ

15-12-2024

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application Number: 2024/2229

Site Address: Bury House 1-4, 31-34 Bury Street, London, EC3A 5AR

Development Description: Notification from City of London of application 24/00021/FULEIA for Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 1 Hillman Street, London, E8 1DY, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours sincerely

[redacted]

Natalie Broughton

Assistant Director Planning and Building Control
Climate, Homes and Economy

PLANNING DECISION NOTICE

Town and Country Planning (Development Management Procedure) (England) Order 2015

Agent:	**Applicant:** Anna Tastsoglou Po Box 270 Guildhall London EC2P 2EJ

Part 1- Particulars of the Application	**Application No:**	2024/2229
	Date of Application:	08-10-2024
	Date Validated:	08-10-2024
	Application Type:	Adjoining Borough Observations

Proposal: Notification from City of London of application 24/00021/FULEIA for Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings

Location: Bury House 1-4, 31-34 Bury Street, London, EC3A 5AR

Part 2 – Particulars of Decision: **No Objection**

Date of Decision: 15-12-2024

Yours sincerely

[redacted]

Natalie Broughton

Your Ref:
Our Ref: 24/03757/OBS

Lambeth

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16616701/004919/001/001

Anna Tastsoglou
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

18th December 2024

RE: REQUEST FOR OBSERVATIONS

Dear Anna Tastsoglou

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and RAISES NO OBJECTION

Application Number: 24/03757/OBS Date of Application: 02.12.2024 Date of Decision 18.12.2024

Proposed Development At: Adjoining Borough Observations Within The Corporation Of London	
For:	Observations on a proposed development within the adjoining Borough of City of London with respect to restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwelt, reconfiguration of partitions, installation of a new staircase, servicing and alt other ancillary and associated works at Holland House 1 - 4, 32 Bury Street London EC3A 5AW (RE-CONSULTATION due to the submission of additional information and revised drawings)

Approved Plans

Cover letter from Corporation of London

Conditions

Lambeth Planning
PO Box 80771
London
SW29 QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

PED8SZ

1 The London Borough of Lambeth raises no comment to the proposal.

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 18th December 2024

Public Comments

The Eastern City and Aldgate Connect Business Improvement Districts (BIDs)

Support letter

Received via email

13th December 2024 at 11:59am (while committee was in progress)

Support Comments

Hackney Council

Received via email

15th December 2024

Lambeth Council

Received via post

Letter dated 18th December 2024

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

Summary

The application relates to a site located on the northeast corner of Bury Street, northwest of Creechurch Lane and it comprises three buildings, namely Holland House, Renown House and Bury House.

The site lies within the recently designated Creechurch Conservation Area, which includes all three buildings. Holland House is a Grade II* listed building, which was built to designs by H.P. Berlage for a Mueller, a Dutch shipping company and completed in 1916. Renown House is a characterful survival of a small-scale early 20th-century office building, not listed but considered a non-designated heritage asset. Bury House was constructed in the 1967 for use as commercial offices.

Planning permission for the demolition of the building at 31 Bury Street and the construction of a 48 storey tower building was previously refused, under the terms of application 20/00848/FULEIA. The reasons for refusal included the adverse impact of the development on the setting and amenities of the Grade 1 listed Bevis Marks Synagogue by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue and the adverse impact of the development on the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion. It was considered that the public benefits of the development did not overcome the harm identified to the heritage assets.

The current proposal incorporates three buildings, as noted above, and not only Bury House. In terms of the tower element of the proposal though, this has been amended by reducing the height of the building by 19 metres, and by setting back the top eight floors, at level thirty-seven to reduce the massing towards the termination point of the tower.

The redevelopment of the site is covered by two applications; one application for planning permission (ref.no.: 24/00021/FULEIA) and one application for listed building consent (ref. no: 2400011/LBC).

Planning permission is now sought for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House and interconnection of the three buildings. The use of the buildings would be office (Class E(g)(i)), including affordable workspace,

flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses. The development also includes the provision of a new covered pedestrian route, cycle parking and facilities, public toilet, landscaping and highway improvements and the provision of a single servicing access point onto Heneage Lane.

Listed building consent is sought for the restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Objections have been received from statutory consultees including Historic England, the Greater London Authority, the 20th Century Society, the Victorian Society, the Georgian Group, Historic Royal Palaces, the CAAC, SAVE Britain's Heritage, the London Borough of Tower Hamlets, as well as several objections from third parties, including the Jewish community, relating to the scale, massing and design of the development and its perceived impact on designated heritage assets, including the Tower of London World Heritage Site, the Bevis Marks Synagogue and the Creechurch Conservation Area and concerns around the ability of the Synagogue's congregation to use the Synagogue and its courtyard as a place of worship due to the daylight, and overshadowing impacts and by reason of the reduced visibility of the night sky and the moon. This report has considered these impacts, which are addressed below.

The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings.

The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

The scheme would provide 34,584 sqm (GIA) of office floorspace (Use Class E(g)(i)), which would be flexible, sustainable Grade A office floorspace suitable

for circa 2,470 FTE City workers. The site is within the City's growth modelling and would deliver 1.5% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international, financial and professional services business centre.

The proposed office floorplates would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses, providing office tenants with their own private entrance and dedicated floor rather than sharing with other tenants, which will ensure that the floorspace is attractive to a range of potential occupiers. The proposal would also provide 1,170sqm of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities, fulfilling the City's vision to providing inclusive workspace.

Alongside the office space the proposed flexible educational/ cultural/ community/ sports/ multi-faith space within the lower ground, ground and first floors of the three buildings, would combine to create a compelling and inclusive public offer in the heart of the cluster in line with the Destination City agenda. These multi-functional bookable spaces would attract a wide range of activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours will be free of charge. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City Cluster. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community. The provision of a changing place, public toilet and water fountain, will be secured by condition.

The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8,

DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

Officers consider the site to be acceptable for a tall building, supporting the consolidation of the City Cluster. While there is conflict with Local Plan policy CS7 (3) and CS14 (2) and London Plan D9 B (3), because the site is located in a conservation area and therefore considered inappropriate for a tall building, officers nevertheless find that the qualitative impacts of the proposal would be acceptable and that it would accord with London Plan Policy D9 A, C and D, Local Plan Policy CS7 (1,2, 4-7), draft City Plan S12 (1,2, 4-10) S21 (1,3-8). Most relevantly, the proposal would not cause harm to the setting, significance, character or appearance of the Creechurch Conservation Area in which it is situated. As such, officers consider the site acceptable for a tall building, notwithstanding some limited further conflict with emerging City Plan 2040 S21 (5) due to an impact on the significance of the grade II* listed Holland House which forms part of the application site.

The proposal would be a sophisticated new addition to the City Cluster, massed in tapering stages to form an endpiece at the eastern edge, and clad in pale blue faience elevations to do so elegantly and differentiate it from the more glazed towers at the centre. It would enliven the locality of the City at its feet by reinstate the lost leg of Heneage Lane with a new route and retail arcade and reimagining the existing open space between Bury House and Holland House; both these existing buildings on the application site and the new spaces between them, and the wider locality, would be made more accessible, inclusive, inviting, and animated by the scheme. The creation of the proposed new public spaces and improvements to the existing public spaces are considered by officers to be a benefit of the scheme. The proposal would comply with the relevant design policies set out above.

The proposal would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

The proposals would preserve the characteristics and composition of all relevant strategic views and would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including

from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.

The proposal would result in a low level of harm to the grade II* listed Holland House. As such, it would fail to preserve the significance/special interest or setting of this designated heritage asset and conflict with Local Plan policies, CS12 (1 and 2), DM12.1 (1), Draft City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan CS14, CS 12 (2-5), CS13 and DM12.1 (2-5) DM12.5 Draft City Plan 2040 S11 (1,3-5) S 13, HE1 and London Plan HC 1 (D), HC2, HC3 and HC4. Most germanely, they would preserve the setting and significance of Bevis Marks Synagogue and the special interest, character and appearance of the Creechurch Conservation Area.

Giving considerable importance and weight to the desirability of preserving the significance of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits, set out in more detail in the Heritage section below, include a low level of enhancement to the grade II* Holland House and a low level of enhancement to the Creechurch Conservation Area. The public benefits include the delivery of growth in a highly sustainable location, the opening up of Holland House, and in particular its heritage lobbies, to a much broader demographic, and the provision of a highly compelling mix of educational/ cultural/ community/ sports/ multi-faith spaces across the lower levels of the proposal. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

The proposals comply with the required initial steps of archaeology investigation, in accordance with Local Plan DM 12.4, emerging City Plan 2040 HE2 and London Plan HC1, subject to archaeology conditions.

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (582 long stay and 85 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The three buildings are proposed to be serviced by a single

point onto Heneage Lane. 66 daily trips are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.

Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. The whole life-cycle carbon emissions per square meter of the selected option would be the lowest out of the 4 options tested. A lower new build option might be able to deliver the same sustainability benefits with less carbon impacts, however, the scheme in its proposed form would unlock a number of benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.

The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

Compared to retrofit options with limited extension potential, the proposed development would result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding harmful interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. The energy strategy has been optimised for the site and a BREEAM “excellent” rating is targeted, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining approximately 35% of the existing structures, as well as designing for longevity, adaptability and low maintenance. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would overall comply with London Plan policies SI 2, SI 7, Local Plan policies CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise,

contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant. In terms of thermal comfort beneficial impacts are expected on the existing benches to the north of 30 St Mary Axe.

A number of objections have been received from Bevis Marks Synagogue and members and the wider Sephardi community, inter alia, relating to the impact of the development to the historical and religious significance and the setting of Bevis Marks Synagogue, the loss of daylight and sunlight to the Synagogue, overshadowing of its courtyard and the ability to view the night sky and the moon in order to recite the Kiddush Levana prayer.

All the representation received are set out in the main body of the report and are also included in full in the background papers.

As discussed above and in length in the main body of the report, it is considered that the proposed development would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

In terms of the daylight and sunlight impacts into the Synagogue, officers are extremely cognisant of the matters raised by the Jewish community and have analysed these in considerable detail. However, it is considered that the impacts would be limited, localised and minimally noticeable at ground floor level and slightly more noticeable at the southwest area to the mezzanine level. The VSC effects caused by the proposed development are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA terms. The effects of cumulative scenarios have been assessed including consented and unconsented schemes. Although minor to moderate adverse effects are identified in the cumulative vs existing baseline scenario, the additional effects would be due to other consented schemes. It is also noted that BRE guidelines for daylight distribution and sunlight are again met in the cumulative scenario.

As such, it therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah and the Ark. Consequently, on the basis of the detailed evidence provided, officers come to the view that the visual appreciation of the religious ceremonies and associated activities including the reading of religious texts would not be diminished to a significant or perceptible degree. From this it can be concluded that, based on the quantifiable daylight impact results, the effects of the proposal on daylight

to the interior of the Synagogue would not be great enough to compromise the religious use or activities therein.

Since the submission of the application, a daylight and sunlight empirical report has been submitted on behalf of the S&P Sephardi community and the Bevis Marks Synagogue Rabbi. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that the although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

An application at 31 Bury Street proposing the erection of a 48-storey tower was previously refused by reason of the overbearing and overshadowing impact of the tower to the Synagogue's courtyard. Since the determination of the previous application the courtyard of the Synagogue has undergone changes to include a new ramp to the visitor centre, permanent security booth at the entrance of the site and ticketing booth on the northern part of the courtyard. At present no area of the courtyard receives two hours of sunlight on 21 March and therefore, although no area would be able to receive sunlight on the 21 March following the erection of the proposed development, the BRE guidelines are met. The Sun Exposure analysis and shadow diagrams, submitted with the application, show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when comparing the proposed development (including the consented schemes) with the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. As a result, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would affect the setting of the listed building or its associated amenities and it would not preclude from continuing to be used for religious events and as part of the visitor experience visiting the Synagogue's exhibition centre.

To respond to the concerns raised regarding the ability to recite the Kiddush Levana prayer, the applicant has submitted a Lunar Transit Study, assessing the impact the development would have on the visibility of the moon in the night sky. This study was independently reviewed. Following discussions with the Synagogue's Rabbi, the visibility of the sky from two observer points at the entrance of the Synagogue courtyard were assessed. Based on the results produced taking into account a full moon cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistice respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistices from both points. When considering the months and days that the moon would be able to be visible, taking into account the development alone (cumulative vs future baseline) it is noted that there would be no further reduction in the months that the moon would be able to be visible (the moon would still be able to be viewed 8 months of the year) and minor reductions in the number of days (50 days instead of 52 or 51 days every year, in case of a major and minor lunistice year respectively). In terms of hours there will be a reductions exceeding 40 hours in each year.

It is therefore concluded that currently there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings. The proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline. Although the impact of the development in terms of relative losses is acknowledged, the prayer would still be able to be recited in those same months each year as the future baseline scenario. Whilst the development would have some impact on the ability to recite the Kiddush Levana Prayer due to the reduced hours that the moon would be able to be visible, it would not have a material impact on the ability to carry out of other religious practices including circumcision, the observance of Shabbat, and daily obligations. It is the view of officers that such an adverse impact is small, and should, taking account of the duties imposed by section 149 of the Equality Act 2010, therefore be attributed limited weight. In any event such adverse impact would be outweighed by the many public benefits of the scheme as set out in this report.

In terms of daylight impacts on other receptors, the proposed development would result in no significant adverse effect on the majority of the properties

assessed with the exception of 2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane which would experience moderate adverse effects. However, the absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels.

It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, Eastern/City Cluster and public realm would be complied with that, notwithstanding the conflict with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces), CS14 (Tall Buildings); Draft City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), S21 (City Cluster Key Area Of Change) and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan (such as the proposal before you) without delay.

As discussed above, the paragraph 208 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less that substantial harm.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached. Officers also consider that the applications for listed building consent should be granted.

Recommendation

(1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) The direction made by the Secretary of State under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015;

(b) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);

(c) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) (England) Direction 2024 and the application not being called in under section 77 of the Town and Country Planning Act 1990;

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

(2) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.

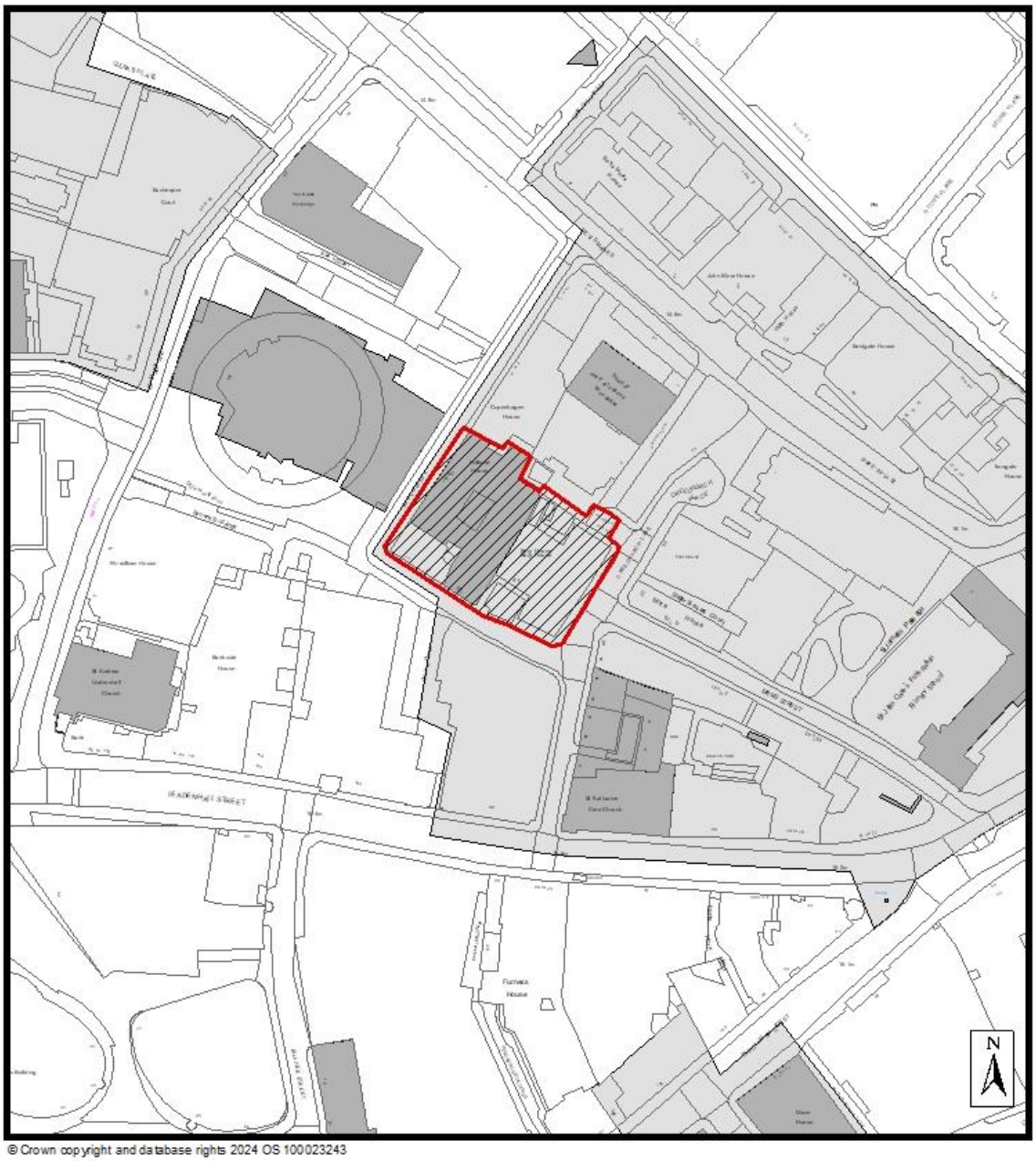
(3) That your Officers be instructed to negotiate and execute obligations in respect 55 of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.

(4) That members note that land affected by the building which is currently public highway and land over which the public have right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for

the area shown marked on the Stopping-up plan annexed to this report under the delegated arrangements approved by the Court of Common Council.

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

Site Location Application Plan



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ADDRESS:
1-4, 31-34 Bury Street

CASE No.
24/00021/FULEIA

SITE LOCATION

LISTED BUILDINGS

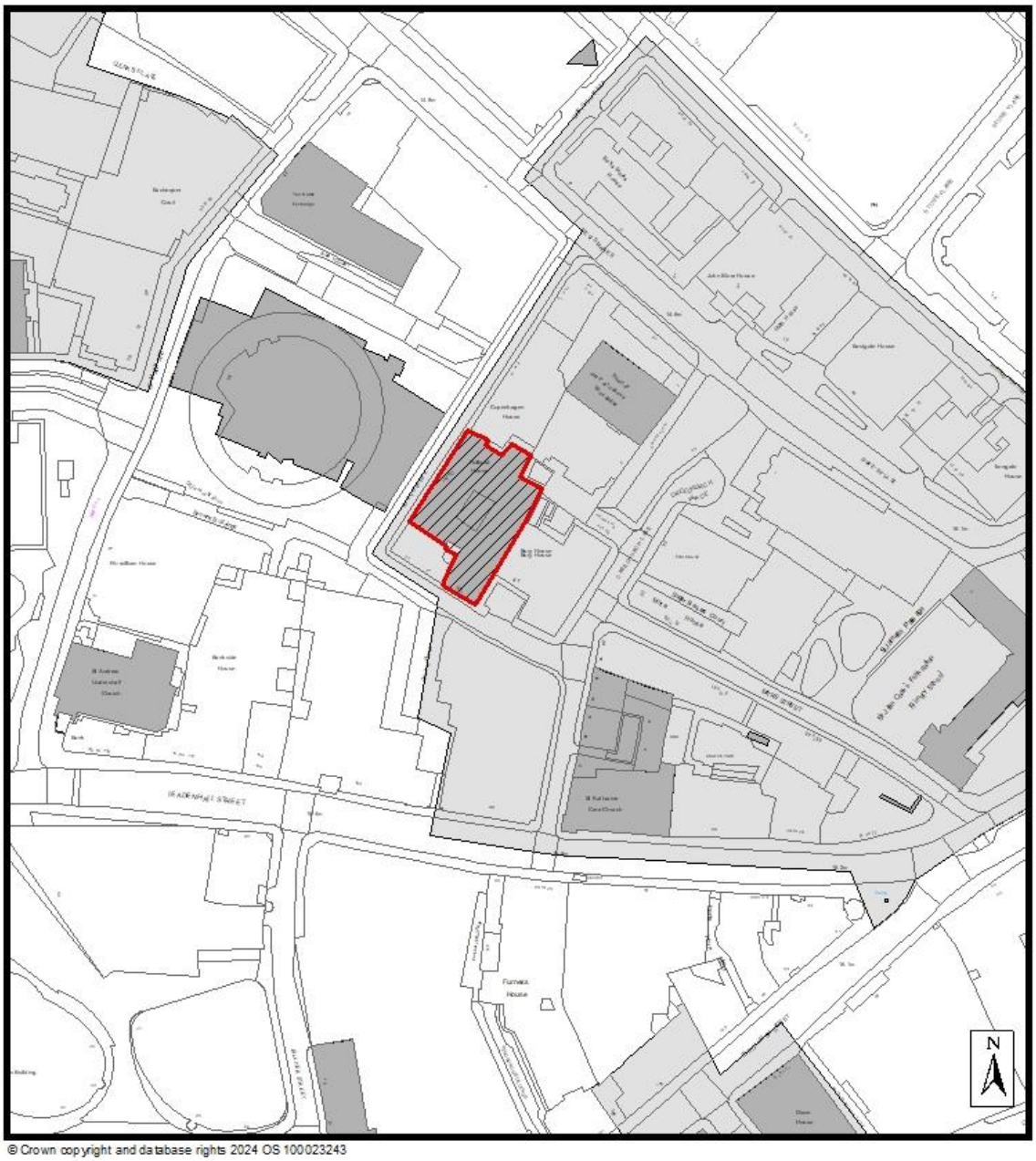
CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Site Location Application Plan



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ADDRESS:
1-4, 32 Bury Street

CASE No.
24/00011/LBC

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Site Photos

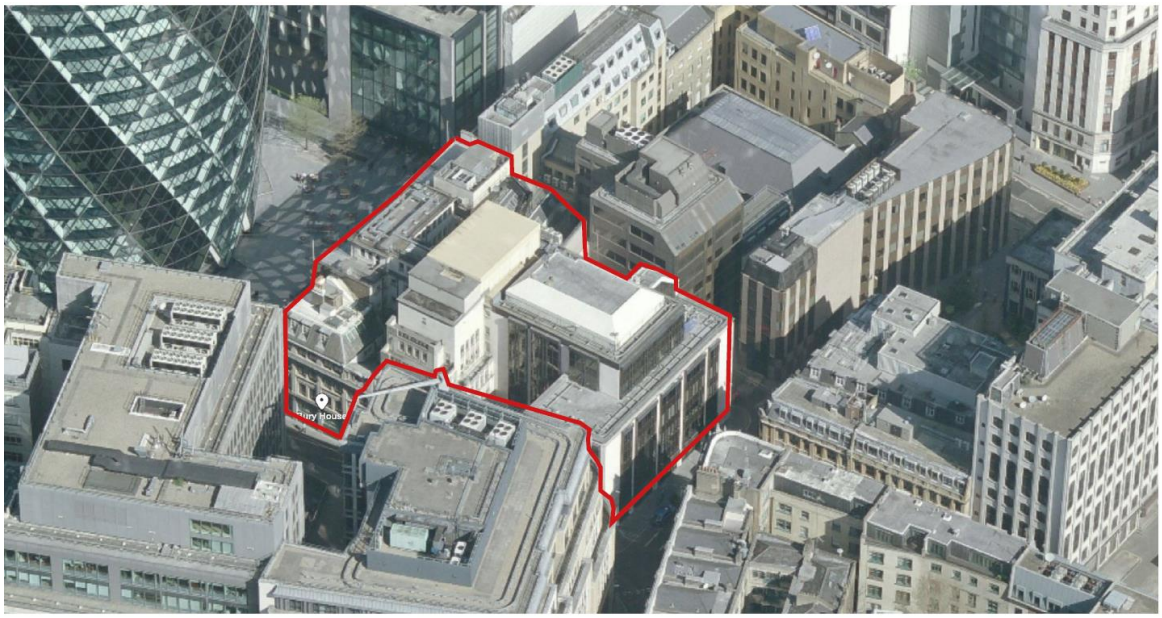


Figure 1: Application site -Aerial view (south)



Figure 2:View of Bury House from Mitre Street



Figure 3:Bury House entrance. View from Bury Street.



Figure 4: View of Bury House from Bury Street.



Figure 5: View of Bury House from Heneage Lane.



Figure 6:view of Renown House from Bury Street.



Figure 7: View of Renown House from St Mary Axe plaza.



Figure 8: View of Holland House from St Mary Axe plaza.



Figure 9: View of Holland House (southwest elevation) from Bury Street.



Figure 10: View of Holland House and Renown House from Bury Street.

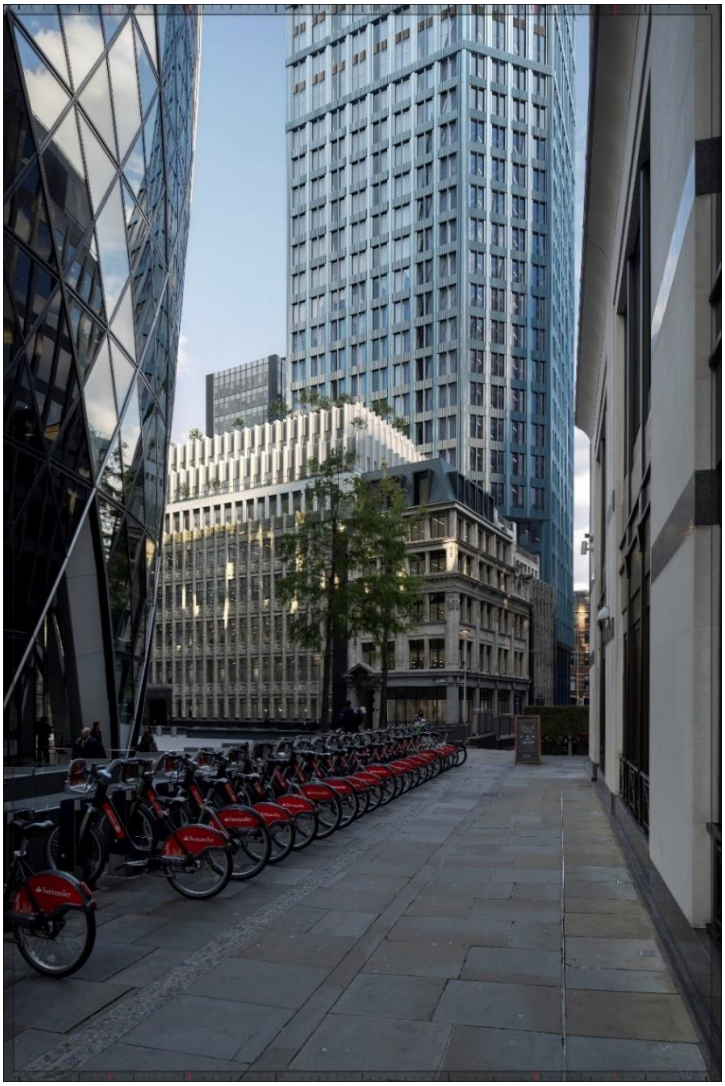


Figure 11: Proposed development - View from south part of the Gherkin plaza.



Figure 12: Proposed development - View from Bury Street.

TOPIC	INFORMATION			
1. HEIGHT	**EXISTING**		**PROPOSED**	
	Bury House = 42.40m AOD Holland House = 43.57m AOD Renown House = 35.49m AOD		Bury House = 178.700 m AOD Holland House = 48.05m AOD Renown House (36.49m AOD)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	10,064 sqm	Office	34,584 sqm
	BOH	1,275 sqm	Ancillary (Basement / BOH)	4,794 sqm
			Retail (Class E(a)/E(b)	504 sqm
			Community/Education/ Cultural/Amenity	1,411 sqm
	TOTAL	11,339 sqm	TOTAL	41,293 sqm
			TOTAL UPLIFT:	29,954 sqm
3. OFFICE PROVISION IN THE CAZ	Existing GIA: 10,064 sqm Proposed GIA: 34,584 sqm Uplift GIA: 24,520 sqm (**243.6% uplift** from the existing office floorspace)			
4. EMPLOY-MENT NUMBERS	**EXISTING**		PROPOSED	
	330		Between 1,905 to 2,470 new employment opportunities	
5. VEHICLE / CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	19	Car parking spaces	0
	Cycle long stay	15	Cycle long stay	582
	Cycle short stay	0	Cycle short stay	85
	Lockers	0	Lockers	667
	Showers	0	Showers	59
	Changing facilities	0	Changing facilities	3 (Female / Male and Unisex located in the basement levels)
6. HIGHWAY LOSS / GAIN	0.95 sq.m loss / 2.7 sq.m gain			

7. PUBLIC REALM	Existing: 352 sqm Proposed: 619 sqm	
8. TREES	EXISTING	PROPOSED
	Planting at Bury house entrance	4 (Ground Floor) 6 (Sixth Floor) 11 (Eighth Floor) 4 (Ninth Floor) 5 (Twenty Second Floor) 3 (Thirty Sixth Floor) 6 (RF1) Total= 39
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	78 two-way vehicle trips (including 38 car trips)	66 two-way trips (33 vehicles)
10. SERVICING HOURS	Servicing allowed throughout the day other than restricted hours as detailed below: 07:00 to 09:00 12:00 to 14:00 16:00 to 18:00 23:00 on one day and 07:00 on the following day Last mile delivery solutions (e.g. cargo bikes) can deliver at all times.	
11. RETAINED FABRIC	Substructure retained: 64% Superstructure (Frame) retained: 39% Superstructure (Façades) retained: 22% (all percentages show retention by mass)	
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: New Build Areas: 23.7% Refurbishment Areas: 48.2% Site-wide: 28.6% GLA target: 35%	
13. OPERATIONAL CARBON EMISSIONS	33,183 tonnes CO_2 over 60 years 0.803 tonnes CO_2 per square meter over 60 years (includes life-cycle modules B6+B7)	
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	
	Total upfront embodied carbon 59,755 tonnes CO_2e / 887 $kgCO_2e$ per sqm	

15. WHOLE LIFE -CYCLE CARBON EMISSIONS	<u>Total whole life-cycle carbon emissions:</u> 92,938 tonnes CO_2 Total whole life-cycle carbon emissions per square meter: **2.251 tonnes CO_2/sqm**
16. WHOLE LIFE-CYCLE CARBON OPTIONS	<u>Carbon Options</u>






	Option 1 Facade & Services Refurb (3x separate developments)	Option 2 Facade & Services Refurb + Extension (3x separate developments)	Option 3 Facade & Services Refurb + Extension (combining the 3x sites)	Option 4 Full Redevelopment whilst unlocking heritage constraints
Option Reference	1	2	3	4
Project reference period	60	60	60	60
Gross Internal area (GIA) m²	11,207	13,467	13,467	40,558
Net Internal area (NIA) m²	7,845	9,427	9,427	25,278
Change in NIA (compared to existing) m²	0	1,594	1,594	17,445
Substructure % retained by mass	92%	92%	92%	64%
Superstructure % retained by mass	88%	75%	77%	39%
Total WLCA (incl. B6 & pre-demo) ($kgCO_2e/m^2$ GIA, B7 not included)	1,395	1,440	1,424	1,383
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA)	278	332	329	726
In-Use Embodied Carbon (B-C) excl. B6 & B7 ($kgCO_2e/m^2$ GIA)	815	815	815	444
Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	293	282	271	203
Total WLCA (incl. B6 and pre-demo) (tCO_2e, B7 not included)	15,629	19,387	19,177	56,095
Total existing building demolition (tCO_2e)	88	140	130	402
Upfront Embodied carbon (A1-A5) (tCO_2e)	3,120	4,474	4,426	29,450
In-use embodied carbon (B-C) (tCO_2e)	9,134	10,976	10,976	18,008
Operational Carbon for building life time (B6) (tCO_2e)	3,287	3,798	3,646	8,235

17. TARGET BREEAM RATING	Good | Very Good | **Excellent** | Outstanding Policy target Excellent or Outstanding
18. URBAN GREENING FACTOR	0.32 (surpasses policy requirement of 0.3)
19. AIR QUALITY	Air Quality Positive
20. Biodiversity Net Gain	300% Biodiversity Net Gain

Main Report

Environmental Statement

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

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

3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
   - To examine the environmental information
   - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
   - To integrate that conclusion into the decision as to whether planning permission is to be granted; and
   - If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.

4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

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

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

Site and Surroundings

8. The application site is located on the northeast corner of Bury Street, northwest of Creechurch Lane. It is approximately 0.25 hectares in size and it comprises three buildings, namely Holland House, Renown House and Bury House.

9. The surrounding area is on high density and is primarily commercial with some residential properties, religious buildings and some retail units. To the north the site abuts Valiant House and Copenhagen House. Beyond Valiant House, approximately 30 metres north of the site, lies the Grade I listed Bevis Marks Synagogue. To the southeast of the site there are some residential properties along Creechurch Lane with commercial uses at ground floor. The Aldgate school is located further to the east of the site. To the south of the site there are medium rise commercial buildings. Beyond these lie a couple of high-rise buildings including 52-54 Lime Street. Immediately adjacent to the west of the site lies the Gherkin, at 30 St Mary Axe. There are further tall buildings to the west of the site, including the Leadenhall Building (the Cheesegrater) beyond the Gherkin. Another important religious building, Grade I listed St Helen's Bishopsgate Church, in located further to the west of the site.

10. The site lies approximately 500m to the north of the Tower of London World Heritage Site.

11. The site lies within the recently designated Creechurch Conservation Area. The Conservation Area includes all three buildings within the application site. The area that was designated 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). It is noted that the site is not located within the immediate setting of the Bevis Marks Synagogue, as this is defined in the Policy S21 map of the draft City Plan 2040.

12. The site comprises three buildings as stated above. Bury House is a 7-storey commercial building (including the ground floor), which contains an underground car park providing 18 car parking spaces and ancillary storage for 10 cycle parking spaces that can be accessed via a car lift to the north of the site from Heneage Place. There is also 1 car parking space and 15 cycle parking spaces located at ground level. The building was constructed in 1967 for use as commercial offices and has remained relatively unchanged since. The single storey basement provides some ancillary storage and 18 car parking spaces.

13. Holland House is a Grade II* listed building, which was built to designs by H.P. Berlage for a Mueller, a Dutch shipping company and completed in 1916. It extends to seven storeys including the ground floor. The building consists of six storeys with additional set back roof storeys. It is mainly located on the eastern side of Bury Street, however, it wraps around Renown House on the southern corner of the Bury Street. It is of expressionist style with vertical architectural form and vaguely Art Deco detailing, finished in distinctive grey-green faience. Holland House has a very high quality and is considered as one of the architecturally standout buildings in the locality.

14. Renown House is a 5-storey office building including the 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.

15. In terms of size, Bury Street comprises 4,462sqm GIA floorspace, Holland House comprises 6,161sqm floorspace and Renown House is smallest of the three, comprising 716sqm GIA floorspace.

16. Aside of the Grade II* listed Holland House building within the application site and the Creechurch conservation area that the site lies within, there are several other heritage assets in the vicinity of the site, including:

- The Bevis Marks Synagogue (Grade I); located to the north,
- Church of St Helens Bishopsgate (Grade I); located to the west,
- Church of St Andrew Undershaft (Grade I); located to the south-west,
- St Katherine Cree (Grade I); located to the southeast,
- Creechurch Lane No's 2-16 (Grade II); located to the southeast,
- 38 St Mary Axe (The Baltic Exchange) (Grade II); located to the northwest and
- St Helen's Place Conservation Area; located to the north.

17. Other designated heritage assets in the wider area include:
    - The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
    - St Paul's Cathedral (Grade I);
    - Tower Bridge (Grade I);
    - Royal Exchange (Grade I);
    - Lloyd's Building (Grade II);
    - Church of St Botolph, Aldgate (Grade I);
    - Guild Church of St Ethelburga the Virgin (Grade I);
    - The Monument (Scheduled Monument and Grade I);
    - 13 Bishopsgate (Grade I) ;
    - Museum of the Home (formerly The Geffrye Museum, 136 Kingsland Road – Grade I);
    - Former Port of London Authority (Grade II*);
    - Leadenhall Market (Grade II*);
    - Lloyd's Registry, 71 Fenchurch Street (Grade II*);
    - Bishopsgate Institute (and 6 Brushfield Street) (Grade II*);
    - Church of St Botolph Without Bishopsgate (Grade II*)
    - Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II);
    - Gateway in yard of Church of St Katherine Cree (Grade II);
    - Liverpool Street Station (Grade II);
    - 46 Bishopsgate (Grade II);
    - 48 Bishopsgate (Grade II);
    - Hasilwood House 52-68 Bishopsgate (Grade II);
    - Park House and Garden House (Grade II);
    - Finsbury House (Grade II);
    - London Wall Buildings (Grade II);
    - 139- 144 Leadenhall Street (Grade II);
    - 147-148 Leadenhall Street (Grade II);
    - 38 St Mary Axe (The Baltic Exchange) (Grade II);
    - 20 and 21 Billiter Street (Grade II);
    - 2-16 Creechurch Lane (Grade II);

- 10 Brushfield Street (Grade II);
- 14 Brushfield Street (Grade II);
- Whitehall Court (Grade II*);
- Horse Guards (Grade I);
- War Office (Grade II*);
- Ministry of Defence (Grade I);
- Leadenhall Conservation Area;
- Bank Conservation Area;
- Bishopsgate Conservation Area;
- Finsbury Circus Conservation Area;
- The Tower of London Conservation Area
- Bunhill Fields and Finsbury Square Conservation Area;
- St James Park Registered Historic Park and Garden (Grade I);
- Finsbury Circus Registered Historic Park and Garden (Grade II);
- Bunhill Burial Ground Registered Historic Park and Graden (Grade I)
- 113-116 Leadenhall Street (Non-designated heritage asset);
- Liverpool Street Arcade (Non-designated heritage asset);
- 33-34 Bury Street (Non-designated heritage asset);
- 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset);
- 24 Creechurch Lane (Fibi House) (Non-designated heritage asset);
- 12-14 Mitre Street (Mitre House) (Non-designated heritage asset);
- 27-31 Mitre Street (Non-designated heritage asset);
- 30 St Mary Axe (Non-designated heritage asset); and
- Liverpool Street Arcade (Non-designated heritage asset)

18. The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and Draft City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The Draft City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.

19. For the above reason there are a number of tall buildings in the vicinity of the site and many more in the wider area. Within those in the vicinity are 30 St Mary Axe (the Gherkin, ground plus 40 storeys), 122 Leadenhall Street (the Leadenhall Building, ground plus 51 storeys), 110 Bishopsgate (ground plus 45 storeys), 52 Lime Street (the Scalpel, ground plus 38 storeys), 22 Bishopsgate (ground plus 61 storeys), 150 Bishopsgate (ground plus 40 storeys); 40 Leadenhall Street (ground plus 33 storeys), and 8 Bishopsgate (ground plus 51 storeys). There are more that benefit from planning consent, including within others 1 Undershaft (ground plus 72 storeys)11 and 100, 106

& 107 Leadenhall Street ('100 Leadenhall Street') (ground plus 56 storeys), 115 - 123 Houndsditch (ground plus 23 storeys), Bevis Marks House (ground plus 19 storeys).

20. In terms of public transport, the site is located within Public Transport Accessibility Level (PTAL) 6b (excellent), the highest rating available. The site is served by numerous London Underground, DLR and National rail services within walking distance, including Liverpool Street Rain and Underground Station, Bank Underground Station Aldgate Underground Station, Aldgate East Underground Station, Tower Hill Underground Station, Tower Gateway DLR Station and Fenchurch Street Rail Station. The site is also served by numerous bus services with bus stops within a short walking distance.

Relevant Planning History and Background to the Proposal

21. The most recent and relevant planning history of the site relates to an application under the reference number of 20/00848/FULEIA which was submitted for the '*Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant*.' The application was recommended for approval by officers and presented at the Planning and Transportation Committee on the 5th of October 2021 and overturned to be refused by the Committee Members for the following reasons:

- *The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality).*

- *The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the*

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

22. The application related to 31 Bury Street only and was for a singular tower providing 25,406sqm (GIA) of new floor space. Holland House and Renown House did not form part of the previous application site. Since the refusal of the above application, the current proposal has been amended and two more buildings (Holland House and Renown House) have been included into the application site. The main amendments of the current application in relation to the one previously refused are discussed in the 'Proposal' section of the report.

23. Since the refusal of the previously proposed application the applicant has engaged into pre-application discussions with the aim to address the impacts of the proposed development, which related primarily to the height and massing of the proposed development, albeit maintaining the vision for an office-led tall building.

24. Other planning history of the site relates to Holland House, which was the subject of a Listed Building Consent application granted on 10 May 2022 (ref no.: 21/00838/LBC) for the removal and reinternment of the external faience together with the removal and replacement of existing concrete beam together with associated works.

25. The most recent planning application relating to Renown House was an application which sought the replacement of windows to first, second, third and fourth floors of Renown House. The application was approved in March 2016 (ref. no.: 16/00010/FULL).

26. The following section of the report sets out full details of the proposal.

Proposal

24/00021/FULEIA

27. Planning permission is sought for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys

(178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses. The development also includes the provision of a new covered pedestrian route, cycle parking and facilities, public toilet, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

28. The proposed scheme would provide 41,293 sq.m (GIA) of floorspace comprising:
    - 34,584sq.m (GIA) of office floorspace (Use Class E(g)(i)), including 1,176sq affordable workspace
    - 504sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b))
    - 1,411sq.m (GIA) flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses
    - 4,794sq.m (GIA) of ancillary basement uses, including plant space, cycle storage space, shower facilities and building management, fire command centre, security room, refuse and misc. storage and servicing areas

Office Floorspace

29. In terms of the internal layout, the office floorspace will be provided in smaller floorplates (circa 350 – 580 sqm) within the tower component. The office workspace would include 1,176sqm GIA of community workspace at level 1 of Holland house comprising meeting room space and office space with 60 desks available at affordable rent (50% of market rent for qualifying occupiers and zero rent for charities).

Community, Education and Cultural Floorspace

30. The flexible space would be provided at lower ground, ground and first floor levels of proposed development, primarily within Holland House. This space would include classrooms, flexible immersive room for free use by qualifying users (Holland House Hub), between 8am and 9pm on weekdays and 9am till 5pm on weekends and a 339 sqm GIA auditorium (Creechurch Hall), a multi-functional space for office tenants and the wider community. The later

would be available to qualifying users between 8am and 9pm on weekdays and 9am till 5pm on weekends, with allowance for 12 hours a week and an additional 5 days a year for private and paid use.

31. The proposals also include a 120sqm 'Urban Farm' on the terrace at level 9 of Holland House which will be accessible to those using the Community, Education and Cultural Space, including those using the school classes.

Retail and Café Floorspace

32. The proposed shop, café, restaurant and kiosk uses would be delivered at ground floor level at the west of the site, and will be accessible between 7am and 11pm. In addition, both James' Court and Heneage Arcade are supported by smaller, flexible retail units.

Ancillary space

33. A single servicing area will be provided to serve all three buildings, which will be accessed directly via Heneage Lane.

34. A total of 582 long stay cycle parking spaces will be provided in the basement, lower ground and basement; and 85 short stay cycle parking spaces in the basement and lower ground with concierge service from the ground floor along with associated cyclist facilities, comprising 59 showers and 667 lockers. Cycle parking will be accessed via Creechurch Lane at the northeast corner of the new building. Stairs with wheeling channel are proposed as well as access via lift.

35. An area of approximately 200sqm of workshop and retail space is proposed for a Social Enterprise (City Cycles), which will be a charity aimed for young people living in the local area. The programme will support 8-10 people a year.

Public Realm

36. New and improved public routes and public realm are proposed at ground level. These include the new route through the site, namely Heneage Arcade, extending the existing Heneage Lane, which is proposed to stay in private ownership and management. The Heneage Arcade would be open from 7am until 11pm daily.

37. A new open space, namely James' Court, is proposed to be created at the southern end of the site, off Bury Street, which is also proposed to be privately owned and managed. This would be partially covered under the proposed colonnaded entrance of the tower at 31 Bury Street and it would remain open for public access at all times.

38. Combining both Heneage Arcade and James' Court, the proposed development would deliver 619sqm of new and varied public realm, including the improved areas within the public highway. The City of London's paving pallet will be used for the paving in and around James' Court, including through Heneage Arcade.

39. On the southwest façade of the proposed tower, within St James Court, the proposed development would include an outdoor climbing wall. Public art is also proposed within the public realm.

40. A public toilet accessed via Heneage Arcade is proposed as well as a drinking fountain. This is proposed to be available between 7am and 11 pm.

41. Outside open space would be provided on 6th to 9th floors of Holland House and floors 22, 36 and 41 of the tower at 31 Bury Street. The development would achieve an Urban Greening Factor score of 0.318 (rounded down to 0.31).

Bury House – Design and Massing

42. The design of the proposed tower has a more solid punched façade to respond to and interrelate with the design of Holland House and achieve better sustainability credentials. The façade has strong vertical hierarchy with recessive spandrels which frame single storey windows. The lower section of the building has been designed with a triple order base and double order attic storey before it transitions to the slender upper sections. The taller stepped massing of the upper levels has been designed with a strong horizontal emphasis with an attic storey replicating that of the lower section. The top storeys are designed with increasing façade proportions, with the upper part being three times taller than the lower elements. The entrances are articulated by contrasting material and the principle north and south arcade entrances given priority with a double width opening. The building would be finished in elegant, pale blue faience.

Holland Houe – Design and Massing

43. The proposed development at Holland House would see the existing 1960s and 1980s extensions being removed. The proposed additional massing would be stepped, setting backwards on the top floors, and designed to be symmetrical with principal elevation to Bury Street and largely invisible in the important original views of the building obliquely along that street. The rhythm and verticality of the Holland House facade has been continued in the proposal. Reinstatement works to the façade of the building area are also proposed.

Renown House

44. The existing juxtaposition of Renown House with Holland House is proposed to be retained. The proposals seek to raise Renown House by a single storey by raising the mansard line with a new upper masonry storey at 4th floor level. The floor plates to Renown House have been designed to re-align and interconnect with Holland House and proposed tower at 31 Bury Street. At ground floor level the existing stepped raised ground floor is lowered to provide step free access to Renown and Holland House.

Design amendments to Bury House from the previously refused scheme

45. Consideration has been given to the reasons for refusal of the previously submitted application at 31 Bury Street (Ref. no.: 20/00848/FULEIA). Apart from the inclusion of two more buildings to the application site (Holland House and Renown House), the main amendments to the proposed tower at 31 Bury Street are as follows:
    - The height of the building has been reduced by 19 metres. By this reduction in height at midpoint (level 22) the tower which is proposed to be set back provides a shoulder line creating a proportionate (50/50) balance to the massing of the tower.
    - A further set back has been introduced on the top eight floors, at level thirty-seven to reduce the massing towards the termination point of the building.

24/00011/LBC

46. The application for the Listed Building Consent relates to the restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam;

partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Consultations

Statement of Community Involvement

47. The applicant has submitted a Statement of Community Involvement prepared by Kanda Consulting. Engagement on the proposals was primarily conducted in two phases within a 13-month period between November 2022 and December 2023. Alongside ongoing consultation with the City of London Corporation, Historic England and the Greater London Authority the applicant engaged with (across London and Southeast):
    - 44 Education providers
    - 15 Sporting organisations
    - 44 Charities, social enterprises and community interest companies
    - 26 Arts and cultural organisations and
    - 21 Multi-faith groups
    - 10 Livery companies
    - 14 other organisations

48. 84 meetings were carried out with key stakeholders including:
    - Ward Members
    - Local tenants
    - Resident associations
    - Representatives of surrounding businesses
    - Faith-based organisations
    - Sports England

49. Extensive discussions have also taken place with representatives of the neighbouring Bevis Marks Synagogue over the last five years. At least 13 meetings and discussions have taken place with the representatives of the Synagogue over the two years since the previously refused application.

50. The submitted Statement of Community Involvement advises that during the 6-week period from 23rd October - 3rd December 2023, 22 meetings, trainings and events were hosted at Holland House. 369 people visited Holland House. It is also stated that through the 78 test case and workshop

sessions, it has been identified that there is significant demand for more accessible, affordable and flexible spaces which are accessible to communities and groups both within the CoL and across the Capital.

46. The first phase of wider consultation was held in March 2023 and involved discussions with local stakeholders and immediate neighbours. The second phase of wider consultation took place in June 2023 and provided an opportunity to comment on the detailed proposals for the future of the site. The wider engagement process included the following:
    - Emails sent to local stakeholders inviting them to meet to discuss the emerging ideas and proposals for the site
    - A virtual exhibition of the emerging ideas and the detailed proposals on the applicant's consultation website
    - Two designed two-page flyers, each time distributed to 3,030 properties
    - Four drop-in sessions with an exhibition of the emerging ideas on the 1st and 2nd March 2023 and detailed proposals shared on the 12th and 13th June 2023
    - A total of 32 people attended the exhibitions across the 4 days
    - 5 written responses to two surveys
    - Two social media campaigns, targeted at the local area, which secured a reach of:
        - March 2023: 11,467 individuals, 82,497 impressions and 491clicks
        - June 2023: 4,301 individuals, 51,002 impressions and 236 Clicks
    - A telephone number and email address were available and managed by Kanda consultants.

47. Feedback from key stakeholders mainly focused on the following:
    - Tower element, particularly regarding its reduced scale and massing since the previously refused application.
    - The applicant was encouraged to ensure that the public benefits reflect the needs of the users and the wider area.
    - Suggestion have been made to introduce further cultural, arts and sports groups.
    - Interest was expressed regarding the public realm and questions raised regarding the activation of the ground floor.
    - representatives of the Bevis Marks Synagogue have continued to express opposition, with concerns primarily about the tower element of the scheme.

48. Feedback from other organisations focused on the following:
    - Education:
        - Expressed the need to have a place to visit in the CoL to get young people understand of the possibilities in working in the future.

    - Expressed the need for activities that do not incur a cost.
    - Holland House is easily accessible for schools to visit by public transport.
    - Spaces in Holland House should be designed to support the development of a wide range of skills.
    - Highlighted the need for provision of calm areas; good technology; availability of resources; access to outside space; and flexible areas where they can share and work collaboratively.
    - For the future development, pupils prioritise celebrating the history of Holland House and the CoL.
    - Need for accessible spaces.
    - Provision of outdoor space.
    - Provision of immersive space that enhances curriculum learning, and by providing additional specialist resources and flexible learning space.
    - Delivery of a variety of community building events, celebrating cultural diversity and bringing different groups together to better understand each other and forge relationships.
    - Demand for accessible and affordable spaces within the CoL.
- Sports:
    - Meetings with representatives of Sports England, Netball England, Badminton England, Table Tennis England and GG3x3 (3-a side basketball), have reinforced the need for more casual sports facilities throughout the week.
    - Highlighted the lack of climbing facilities in the City.
- Charities/community interest companies and social enterprises:
    - Affordable meeting space in London has been a constant challenge.
    - It was highlighted that Holland House is ideally situated to address this need with a central location, easy transport links, professional meeting rooms and lobby areas, and additional support facilities.
- Arts and culture:
    - The need for benevolent spaces, such as Holland House, to support the voluntary sector.
- Multi-faith groups:
    - St Helen’s Bishopsgate Church has raised the need for affordable spaces to carry out events and classes.
    - The significant shortage of spaces for faith-based groups to use for prayer within the City of London has been raised.
- Livery Companies:
    - Some Livery companies have raised interest in using Holland House to host events.

- The need for more free or affordable, flexible spaces within the CoL has been expressed.

49. 11 people attended the public exhibition events during the first round of consultation and a further 21 people attended the public exhibition events during the second round of consultation. Feedback from wider public consultation:
    - Community groups, organisations and schools to be given priority for the space at Holland House.
    - The need for more clarification around the operation and funding of the space in the future was raised.
    - The need to improve the buildings' energy performance ratings was identified.
    - Supportive of the introduction of the new green spaces and improvements to air quality and biodiversity.
    - Supportive of the overall space of the tower element of the scheme. the reduction in heigh of seven storeys was recognised.
    - Some consultees raised ongoing concern regarding the potential detrimental impacts to the setting and operation of the Bevis Marks Synagogue.
    - The public realm improvements and activation of ground floor were welcomed by the public.

50. Since the submission of the application, a Statement of Community Involvement Addendum has been submitted, dated September 2024, capturing the ongoing 'Strategic Outreach Programme' from January 2024 to September 2024. Since submitting the planning application, the Applicant has continued to promote Holland House as a space for any interested groups and individuals to use, free of charge. The Applicant has also contacted all 125 Members of the City Corporation and continued updating the Aldgate and Portsoken ward councillors. The Applicant has continued to research and reach out to other potentially interested charities, education providers, arts, culture and faith-based organisations.
51. The abovementioned engagement has had the following outcomes:
    - 6,027 people have visited and / or used Holland House at the time of the submission of the Addendum.
    - The Museum of Diversity has established a semi-permanent office headquarters at Holland House. The museum has used the site for over 133 days.
    - Use of Holland House for Friday prayer sessions for Muslim men and women working in the City of London. It is stated that at the time of the submission of the Addendum 37 prayer sessions had been, each accommodating up to 149 people, with over 1,710 people attending.

- St Helen's Bishopsgate have been using Holland House for Sunday sessions, bringing 490 members of their congregation to Holland House.
- ClusterFlux has established regular weekly meetings of artists and creatives at Holland House with 37 meetings at the time of the submission of the Addendum.
- 86 separate ad-hoc bookings within 2024.
- On the 10th September an event was hosted at Holland House, which brought together 45 representatives of 22 organisations who have used Holland House and expressed interest in being part of the Holland House Hub community in future.

52. The key themes of feedback received through the outreach programme included the following:
    - The cost of hiring spaces within the City is prohibitive.
    - Bury Street is well-located, within walking distance from public transport.
    - More space is needed for the considerable number of multi-faith groups in the City of London.
    - Bury Street can bring people together to foster connections and ideas, collaboration and sense of community.
    - The wide range of flexible spaces was welcomed.
    - There is a lack of space to rehearse in the City and performing in those areas is often out of reach to arts and culture organisations.
    - Need for youth friendly spaces in the City.
    - Holland House offers opportunities to create new attractions, meeting the City of London's Destination City ambitions.
    - There is a lack of spaces to play and promote sports within the City.

Statutory Consultation

53. Following receipt of the application by the Local Planning Authority in March 2024, it has been advertised on site and in the press and has been consulted upon twice as follows:
    - On validation of the application in March 2024 for a period of 30 days.
    - Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, a 30 day consultation period has to be carried out. The application was re-consulted twice for 30 day, of which the second one ended on the 30th November 2024. These consultations covered the request for additional information primarily in conjunction with information

relating to a Lunar Transit Study and other Applicant's responses to the concerns raised by the objectors.

54. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

55. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Greater London Authority (Stage 1 letter dated 10 October 2024)	Stage 1 Letter Strategic issues summary Land use principles: The proposed uplift in office floorspace in the CAZ is supported in land use terms. The proposed element of affordable workspace and community floorspace require suitable obligations, as well as some clarifications and improvements. **Officer response: These points are addressed in the Proposed Uses sections of the report. With regard to the affordable workspace and community floorspace of the development, following negotiations with the Applicant has confirmed that they will be provided for the lifetime of the development.** Urban Design: The proposal is generally well designed as an office-led CAZ mixed use building, however, the final assessment under London Plan Policy D9 will be finalised at Stage 2. However, the applicant should improve the proposed public realm offer to better integrate it into the street context in order to increase this public benefit. The proposed fire statement and public toilets details should be revised and secured. **Officer response: These points are addressed in the Architecture, Urban Design and Public Realm,**

	Public Access and Inclusivity and Fire Statement sections of the report. Heritage: The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to designated heritage assets. Nonetheless, further information is still needed to confirm impacts in full. The final NPPF paragraph 208 balance will be carried out at the Mayor's decision-making stage. **Officer response: These points are addressed in the Heritage and Assessment of Public Benefits and paragraph 208 NPPF balancing exercise sections of the report.** Transport: The applicant should provide a Stage 1 Road Safety audit and identify a suitable location for additional cycle hire services, for which a financial contribution should also be secured. Obligations are also sought for healthy streets improvements, a TfL safety improvement proposal and the submission of a revised Travel Plan. Conditions are also required. **Officer response: These points are addressed in the Highways and Transportation section of the report.** Equality: A degree of positive and negative equality impacts is expected to be caused by the proposals and these will be given further consideration at the Mayor's decision-making stage. **Officer response: These points are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.**

	Other issues on **environmental matters** also require resolution prior to the Mayor's decision making stage. Recommendation That the City of London Corporation be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 99. Possible remedies set out in this report could address these deficiencies.
Transport for London (letter dated 14 May 2024)	Access and parking Pedestrian Access It is proposed that the proposed development will enable access through James' Court (to the south) and also through Heneage Place (to the north) as part of new public route through the building (7am – 11pm). Office access 'out of hours' will be via the Creechurch Lane entrance (to the east). Public and retail uses are accessible wrapping around to the west directly to Renown House and Holland House. This will significantly improve permeability of the site and increase the overall space available for pedestrian movement between Heneage Place and Bury Street and along Creechurch Lane; which is welcomed in line with London Plan policy T2 Heathy Street. A Pedestrian Comfort Level analysis has been undertaken for 13 sections of local streets in the vicinity of the site. It is considered that the streets to be used as the main route for access would be able to accommodate the additional footfall and without adverse impacting the PCLS with B+ rating maintained, while the narrower minor routes would not see any notable increase in footway nevertheless. Cycle and vehicle Access Cycle parking access will be via Creechurch Lane at the north-east corner of the building. The entrance provided is dedicated for cyclists which

	is separated from the pedestrian entrance. The entrance is equipped with a sliding door and stairs with a wheeling channel to access basement B1 and B1 Mezzanine. An alternative cycle access is provided via a lift to the basement within the north core for those not wanting to use the staircases. In addition, A secondary access for cycle parking is provided via the eastern Holland House entrance, off James' Court, via lift or stair, this welcomed. Vehicle Access TfL welcomes that an off-street servicing area at the north west corner of the site is provided to serve Bury House, Holland House and Renown House, in line with London Plan Policy T7 Delivery & Servicing, and is accessed directly via Heneage Lane. Having said that, Stage 1 Road Safety audit is required to support its acceptability in highway safety terms. Cycle Parking A total of 667 cycle parking spaces will be provided, of which 585 spaces will be for long stay spaces, and 85 short stay spaces. It is also proposed that 5% (29 spaces) will be provided the form of adaptable spaces to accommodate users of larger / unconventional cycles and those with mobility impairments. The remaining spaces will be in the form of Sheffield Stands (87spaces), and Fold bike lockers (58) and 1 High Density solution type space. Alongside with long stay cycle space, the short stay spaces will be provided within the basement level 1 (B1) and B1 mezzanine level accessed via the Creechurch Lane cycle entrances. All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5

	Cycling and London Plan cycle parking standards. Car Parking TfL welcomes that no on-site car parking has been proposed as the proposal will be 'car free'. As per current, on-street blue badge parking spaces are available on Creechurch Lane and Mitre Street. Healthy Street & Vision Zero An Active Travel Zone assessment (ATZ) has been undertaken and seven routes has been reviewed. The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc. Since part of the land use of the proposed development would be for flexible community/education/ cultural/amenity use; therefore TfL considers that an Nighttime ATZ shall also be carried out to assess routes for darker hours, ensuring safety and security for vulnerable users. TfL is developing safety improvement proposal for the A10 Bishopsgate, the estimate cost of the project is currently £1.5m, therefore a partial contribution of £350K is sought from this proposal toward the project, the amount of contributions is based on common approach adopted for proposed developments in the area. The City Corporation is encouraged to secure necessary improvements for work on its highway network accordingly. Trip generation The submitted TA expected that the proposal would generate a total of 966 two-way trips are forecasted in the AM Peak (08:00-09:00) and 955

	two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 690 two-way persons trips during the peaks compare with the existing offices. This assessment is considered robust and is therefore accepted. A lower level of trips is also expected for the proposed retail use, which is not considered significant. Mode share It is also predicted that vast majority of the trips to/ from the proposal will be by sustainable transport modes. Of those, nearly 10% of trips will be by bike or on foot, and 7% will be by bus, 38% by tube and 47% by rail (including Elizabeth Line); and the level of car and taxi trips are negligible. Public Transport service The site is already with a very high level of public transport services; it is therefore considered that the proposal would not give rise to significant adverse impact to existing London Underground and local bus services in City area. London Cycle Hire It is estimated that the proposal would generate an additional 309 two-ways cycle trips over the current proposal, which means additional demand for cycle hire services. A financial contribution of £100K and land to construct additional docking station on footprint or as close to it as possible is therefore sought. The applicant is urged to identify a mutually agreeable location that would be accepted by the City Corporation and TfL Delivery & Servicing It is welcomed that at at-grade off-street on-site service yard will be provided for servicing, access from Heneage Place. A draft Delivery and Servicing Plan (DSP) has been submitted, which outlines the servicing arrangement for the proposal, includes consolidation and restricting

	servicing vehicle size of goods vehicle of up to 7.5T with 8m maximum length, this is due to the restricted width of Heneage Lane and the vehicle weight limit. However, the DSP shall also promote the use of cycle servicing to reduce goods vehicle traffic in the City and be more sustainable; as well as enabling night-time servicing to reduce traffic impact during normal business hours. The DSP should therefore be revised the comments above, and the final detailed DSP should be secured by pre-occupation condition. Construction Logistics A Detailed Construction Logistics Plan (DSP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition. Travel Planning A Framework Travel Plan have been submitted which is welcomed. It is considered that the 5 years mode shift targets to walking and cycling should be more ambitious to achieve the Mayors' long terms aspiration for 80% sustainable travel by 2041. The Travel Plan should therefore be revised to reflect the comments above, and the finalised Plan should be secured by s106 planning obligation. Community Infrastructure Levy The MCIL2 rate for City of London is £80 per square metre. Summary The following matters should be resolved before the application can be considered in line with the transport policies of London Plan;

	1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreement' 2. Undertake Stage 1 Road Safety Audit for the proposed servicing access 3. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ. 4. Secure a partial financial contribution of £100K for TfL toward proposed A10 Bishopsgate improvement. 5. Secure the submission and approval of cycle parking details by condition. 6. Secure £100K (index linked) financial contribution toward enhancing local cycle hire services. 7. Revise the DSP in light of comments, and secure approval of both DSP and CLP by conditions. 8. Revise the Travel Plan, and ensure that the Plan would contribute positively toward the Mayor's sustainable travel goal and secure them by s106 agreement; and 9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail. **Officer Response: These matters are addressed in the Highways and Transportation and the Planning Obligations and Community Infrastructure Levy sections of this report. Officers, the applicant and TfL have been in discussions in respect of the matters raised.**
Historic England (letter dated 15 May 2024. An email has also been received, dated 8 October 2024, by Historic England following re-consultation advising to refer to	Summary**:** In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall

their original objection letter dated 15 May 2024. Another letter, dated 18 November, was received.)	building would have harmed the Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal in our view. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective. Historic England objects strongly to the applications and recommends they should be withdrawn or refused. Historic England Advice Significance of the heritage assets a) Tower of London World Heritage Site The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value as an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. They reflect the Tower's role as the setting of many significant episodes of European history and as one of the best surviving examples of a medieval fortress palace in the world. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. The World Heritage Site (WHS) is located approximately 550m south-east of the development site. The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value

	(OUV). The Statement of OUV adopted by the World Heritage Committee, in the section relating to integrity, notes that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.' The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), is historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower's attributes as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance. These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they 'rely to a great extent on its setting' (IR 14.25) and, of the latter three attributes, 'the sky space component…is central to its OUV' (IR 14.29). The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London. b) Bevis Marks Synagogue (Grade I listed) Bevis Marks Synagogue is the oldest surviving synagogue in the United Kingdom. It was built between 1699-1701 for a growing Sephardi community in the City of London, following the Resettlement of the Jews in England in the 1650s. The synagogue has been described as the 'Cathedral' Synagogue to Anglo Jewry, such is its stature and symbolic importance. The synagogue is a key part of the history of British Judaism and is of international

		importance, particularly given its roots in the Sephardi diaspora created by the expulsion of Jews from the Iberian Peninsula in 1492. The synagogue continues the traditions of those communities who travelled to the Low Countries and is now one of the oldest continually functioning synagogues in Europe. The synagogue is remarkably little altered. Its architectural and historic significance, including its communal value is clearly exceptional and it is Grade I listed for that reason. Its setting, whilst somewhat compromised by the evolving City around it, continues to make an important contribution to its architectural and historic significance and the ability to appreciate that significance. The premier example of early synagogue architecture in England, Bevis Marks Synagogue was built by the master craftsman Joseph Avis who worked closely with both Sir Christopher Wren and Robert Hooke elsewhere in the City. It is a simple, well proportioned classical building executed in brick and shares much in common with the style preferred for public buildings and churches, designed by the likes of Wren, at the time. Perhaps the most striking way that the synagogue is externally distinguishable from these places of worship is by its discrete siting away from the street in a small courtyard. Its hidden away location suggests a degree of caution, or limitation, for a place of worship (particularly when compared to the near contemporary Sephardi synagogue in Amsterdam). Nevertheless, the high-quality architecture was a demonstration of their faith and an investment which suggests the congregation were confident that they would remain welcome in London. In this way architecture was used by the Sephardi community to establish a positive identity, and permanence, within society.

	Historically, the synagogue formed part of a wider estate with lower rise community buildings encircling it. Despite modern development largely replacing the former one and two storey ranges, the form of the courtyard remains, and the enclosure continues to provide separation from the outside world. The synagogue is the pre-eminent feature of the space, reflecting its function and status. It is currently seen with a largely clear sky backdrop which enhances its presence. The adopted Conservation Management Plan (CMP 2019) for the synagogue notes that the courtyard represents an arresting point of departure from the modern world into what is palpably a historic place. It states that 'views across and out of the courtyard, as well as visibility of the sky are important contributors to the setting of the synagogue, as well as the courtyard's amenity value.' We note that the synagogue has liturgical practices which include interactions with the sky and celestial bodies. The CMP further explains the communal significance of the courtyard as a place where people gather before and after services and other events, including weddings. It therefore has a key role in supporting the customs and traditions of the synagogue. Modern development, including tall buildings, is increasingly visible in the wider setting of the synagogue. Where tall buildings encroach into the skyspace around the courtyard and have windows facing into it, they reduce its special sense of privacy and openness to the sky. This makes elements of the setting particularly sensitive to further erosion or loss. The synagogue nevertheless continues to benefit from a large amount of clear sky making a strong positive contribution to the buildings setting and significance, and the ability to appreciate these. c) The site - Holland House (Grade II* listed), Renown House and Bury House

	Holland House was designed as the London headquarters of W.M. Müller & Co by the preeminent Dutch architect H.P. Berlage, from 1913-16. It is a highly original office design and the only example of his work in the country. This building is now prominently sited, following the construction of the Gherkin and the creation of the public space around it which has enhanced the ability to appreciate its significance. It is an important building particularly because of its pioneering approach to rational façade design. The primary elevation has a regular grid without any apparent hierarchy - radical for its time. The realised design was unprecedented in London, reflecting Berlage's interest in contemporary American architecture and his own progressive ideas. The building is of more than special interest which is reflected by its Grade II* designation. Holland House wraps around the slightly earlier 33-34 Bury St (Renown House) to the south, a good quality but unlisted commercial building of 1912 (designed by the architect Delissa Joseph). It contributes positively to the setting of Holland House. Despite being separated by only a few years, the traditional architectural language of Renown House, including the hierarchical arrangement of its floor levels as expressed in its composition, contrasts unmistakably with the radical approach to façade design pursued at Holland House. This juxtaposition enhances the appreciation of the latter's significance. 31 Bury Street (Bury House) is a late 60's office building. While its design is of no particular merit, it is sympathetic in scale to its historic neighbours. Bury House is physically connected to Holland House, which also has alterations and extensions contemporary with the former that detract from the listed building's significance.

	d) Creechurch Conservation Area Recently designated for its special architectural and historic interest, the Creechurch Conservation Area's character is embodied in three exceptional Grade I listed places of worship: Bevis Marks Synagogue, the churches of St Katherine Cree and St Botolph-without Aldgate. Alongside these are high quality commercial buildings and warehouses from the late-nineteenth and early-twentieth centuries. Subsequent modern development is generally sympathetic to the historic scale, resulting in a clearly defined character worthy of preservation. The tall building at 1 Creechurch Place is an outlier which detracts considerably from the area's qualities. Holland House, Renown House and Bevis Marks Synagogue make a strong positive contribution to the conservation area's special architectural and historic interest. Although Bury House may not make a distinct positive contribution, its perceived scale is sympathetic to its neighbours and the area more broadly. The loss of James Court and the southern part of Heneage Lane caused by its construction has interrupted the historic urban grain to a small extent. Impact of the proposals The proposals are for the replacement of Bury House with a new 44 storey building (178.7m AOD) and the alteration and extension of Holland House and Renown House. a) Tower of London World Heritage Site The current proposals show a modest reduction in height and a chamfering of the massing at the uppermost part of the building, compared to the refused scheme. The proposed tower would, though, be slightly wider than the previous scheme in its middle section. We conclude the proposals would cause a similar

		level of harm to OUV as the previously refused scheme. While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower's turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height. Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also standout from the Cluster due to the proposed cladding material. The additional height that would be introduced at its eastern edge, would result in a striking upward step in scale directly beside the White Tower, creating much more of a cliff edge than the current situation. It would therefore present a greater distraction and harm the Tower's attributes of OUV as a symbol of Norman power, its landmark siting and its physical dominance, and so harming the integrity of the WHS. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above. The experience from Tower Bridge is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest

	turret of the White Tower when it moves through the sky space behind it. The proposals would introduce a comparable scale and mass to the Gherkin, evident notably closer to the Tower, leaving less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City and its silhouette would be further compromised when compared to the existing situation, adding to the harm to the attributes of OUV we have identified above. The proposed development would also be visible within the Tower of London Inner Ward. At different points it would appear above the roofline of the Chapel Royal of St. Peter ad Vincula and 2 Tower Green (both Grade I listed), adding further to the visual intrusions of various tall buildings in the City. Consequently, it would further diminish the self-contained ensemble of historic buildings and spaces, distracting from the Tower's remarkable sense of place. b) Bevis Marks Synagogue The proposed development would harm the significance of the synagogue, intruding directly behind it when viewed from its courtyard. The new tower would appear closer to the synagogue than any other existing tall building development, greatly reducing the clear sky backdrop, resulting in a worse scenario than the previously refused application proposals. The ability to appreciate the architectural interest of the synagogue would consequently be diminished. Its precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale. The new tall building would become a dominant feature of the courtyard at the expense of the synagogue, diminishing the latter's role as the focal point of the space. The special historic character of the place and the deliberate sense of separation from the outside world would be further diminished. The

	ability to see clear sky from the courtyard would also be lost, breaking the visual link between the space and celestial bodies. Such harm needs to be considered in a cumulative context, with existing and consented tall buildings already having a damaging impact. These proposals would cause a greater degree of harm than those schemes, because of the location of the development site relative to the synagogue, evident immediately upon entering the courtyard. c) Holland House and Renown House Holland and Renown House would be altered in order to combine them with the proposed tall building on the site of Bury House. We note as heritage benefits the conservation works and proposed increased access, which would improve the ability to appreciate the significance of Holland House. However, the alterations would include the demolition of party walls in order to provide better connectivity and to enable a shared core. The light well in Holland House would be extended and subdivided. These alterations would result in harm to Holland House by compromising the legibility of its historic design. Both Holland House and Renown House would be extended upwards which would result in a greater level of harm to the listed building and to the conservation area. In the case of Holland House, the addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing. The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height.

		The proposed tall building would appear to tower over Holland House distracting from an appreciation of its high architectural interest, causing further harm. c) Creechurch Conservation Area The proposals would similarly harm the conservation area by reducing the positive contribution made to it by these buildings. The scale of the proposed tall building would detract from a relatively consistent historic scale and become the dominant form. We note proposals offer modest enhancement to the character and appearance of the area by reinstating the southern part of Heneage Lane as a route through, which would be a small heritage benefit. Relevant Policy The letter sets out relevant policy. **Officer comment: The relevant policies are set out in the policy section of this report.** Historic England's position Historic England objects strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, contrary to planning legislation, policy and guidance. We do not support the development of a building of scale proposed in this location due to the inevitable harmful impact it would have on the historic environment. The reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. a) The Tower of London World Heritage Site

		The previously refused application was subject to a Technical Review by ICOMOS, one of the Advisory Bodies to UNESCO's World Heritage Committee, in July 2022. Given the similarities between the current scheme and the refused one, we consider that ICOMOS' previous advice remains relevant to the current application and should similarly be taken into consideration. ICOMOS considered that the proposals would harm the integrity of the WHS as well as the significance it derives from attributes conveying its OUV. This harm remains in the current planning application. In the case of the World Heritage Site, a small reduction in height of the proposed tall building (without an apparent loss of deliverable office floor space) causes a similar impact. The same attributes of OUV (as a symbol of Norman power, its landmark siting and its physical dominance) and so the integrity of the WHS, would be harmed. The submitted Heritage Impact Assessment for the Tower does not consider the potential for negative impacts on OUV and we disagree strongly with its conclusion of a minor and beneficial impact in LVMF View 10A.1. It does not adequately consider the impact on the important kinetic experience of the viewpoint either. In their technical review, on this point ICOMOS stated that 'the work to maintain a separateness from the Tower is completely unsuccessful'. The same is true of these proposals. The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the Tower. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

		We consider that, despite the changes to the scheme, a high level of harm would be caused to the same attributes of the WHS' OUV. For the purposes of the NPPF, we find that the harm would be in the middle of the less than substantial range to the World Heritage Site. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. Notwithstanding our view that the advice received from ICOMOS on the previous scheme for this site remains relevant, the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the World Heritage Convention, has decided to notify the current case to UNESCO. We consider that any decision on this application would benefit from knowing the position of the World Heritage Centre and/or further advice of ICOMOS. We note that we have received request from the World Heritage Centre to produce a State of Conservation Report for the Tower of London this year, indicating that UNESCO has serious concerns about the impacts of development on the setting of this WHS and its OUV. b) Bevis Marks Synagogue Our understanding of the significance of the synagogue has developed since the previous application. Clear harm would be caused to multiple aspects of the synagogue's significance by blocking the open sky in its backdrop - noting in particular the considerations set out in GPA3 and the assessment of significance in the adopted CMP. We defer to the expertise of the Sephardi community on the aspects of significance that are associated with their religious customs and traditions that may be impacted by the current proposals.

		We think that the harm arising from the proposals would be greater than we previously identified. The harm would fall in the middle of the less than substantial range, which represents a considerable impact to a building and setting of exceptional significance and rarity, which are sensitive to change. The submitted Heritage and Townscape Visual Impact Assessment presents a limited understanding of the significance of the synagogue, and the contribution made by setting to that significance. It does not explain why a different understanding to the adopted CMP has been reached with regard to the value of the sky. We consider that the application fails to meet the requirements of Paragraph 200 of the NPPF, as the level of detail is not sufficient. c) Holland House, Renown House and Creechurch Conservation Area. New additional harmful impacts to the historic environment arise through the present applications in the case of Holland House and the newly designated Creechurch Conservation Area, as described above. The proposed roof extensions have not been resolved in a way which avoids or minimises harm in accordance with the requirements of the NPPF. Given its importance as a pioneering building, we think that such harm is difficult to justify. The introduction of a tall building within the conservation area would harm its character and is at odds with the provisions of Local Plan Policy CS12 and CS14. The latter indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas. d) Design and heritage benefits We are not convinced that sufficient steps have been taken to minimise or avoid conflicts between the conservation of all of the designated heritage assets referred to above, as required by the NPPF.

		As context (including the historic environment, as set out in the NDG) is a fundamental aspect of good design, we find that the design quality is poor in this respect. Similarly, the proposals do not appear to comply with the design-led approach required by London Plan Policy D3, as the site's capacity has not been optimised with regard to the site's context and capacity for growth, including the setting of such exceptional heritage assets, which are an important consideration. The heritage benefits arising from the scheme are limited and could be achieved in less harmful ways. We afford them little weight and consider them incapable of outweighing the identified harm. Recommendation: Historic England strongly objects to these applications. We recommend that they are refused or withdrawn. **In their letter, dated 18 November 2024, Historic England state the following:** We have set our position on these applications in detail in our letter of 15 May 2024 and continue to refer you to this advice. The recent amendments concern aspects of the detailed design which do not materially change the impacts on significance. The heritage commentaries submitted by the applicant in response to our advice do not provide any new information which changes our position. We wish to draw the City Corporation's attention to the following points in light of further correspondence and information which has been submitted. In our previous response we advised that given the similarities between the refused application and the current proposals, ICOMOS's previous advice remains relevant to the current application. As indicated in our email to the

	case officer on 24 July 2024, UNESCO's World Heritage Centre has welcomed Historic England's advice that the comments made by ICOMOS in its 2022 Technical Review of the previous application for this site remain relevant and should be taken into consideration in the local planning authority's determination of the current scheme. Please find this email and ICOMOS's Technical Review appended. We would encourage careful consideration to be given to ICOMOS's advice given the potential implications for the World Heritage Site. We note the submission of the Lunar Transit Study Above The Bevis Marks Synagogue (GIA August 2024). This pertains to the Sephardi community's ability to practice the Kiddush Levana ritual - prayers performed outside at night to bless the new moon. A review of the Transit Study (BRE 04 November 2024) notes a significant reduction of visibility of the moon at relevant times of the lunar cycle as a consequence of the application proposals. In our previous response, we highlighted the importance of the clear sky backdrop in the setting of the Synagogue to its significance, both in terms of its tangible and intangible contributions. As set out in 'The Setting of Heritage Assets' (GPA3) 'the asset's intangible associations with its surroundings, and patterns of use' and 'intentional intervisibility with other historic and natural features' (which we take to include the celestial bodies) are relevant to the consideration of impacts on significance. We defer to the expertise of the Sephardi community on their traditions and the impact of the proposals on their ability to worship, but note the clear link to heritage significance raised by this point. In addition to the harm to the Tower of London and Bevis Mark Synagogue, we have also

	previously set out how the proposals would harm the significance of Holland House and the Creechurch Conservation Area. For the purposes of the NPPF, we find that the harm to the former would be in the middle of the range of 'less than substantial' and in the lower part of that range for the latter. Historic England continues to object strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, including the Tower of London and Bevis Marks Synagogue, contrary to planning legislation, policy and guidance. We do not support the development of a building of the scale proposed in this location due to the inevitable harmful impact it would have on the historic environment. We consider that the reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal would result in a worse impact in this case. <u>Recommendation</u> Historic England strongly objects to these applications. We recommend that they are refused or withdrawn. We will update the Department for Culture, Media & Sport (DCMS) in its role representing the UK State Party to the 1972 World Heritage Convention, about the recommendation in your report and the decision of your Planning

	Committee. This is in order that they can update UNESCO World Heritage Centre on this case in accordance with Paragraph 172 of the Operational Guidelines. We have not authorised the granting of listed building consent and will review our position on that matter after your Planning and Transportation Committee has met. **Officer response: The matters in the Historic England objections are addressed in the Tall Building, Architecture, Urban Design and Public Realm, Heritage and Strategic Views and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** **Historic England have withheld the listed building consent authorisation letter for this case and have not issued a direction, meaning that whilst the City can resolve to grant the LBC, the City will not be able to issue the LBC unless and until such authorisation is provided. Historic England have confirmed they are withholding the authorisation because they object to both proposals. Historic England will be updated and informed of the decision of the committee.** **Please note that the ICOMOS Technical Review relating to the previous application at 31 Bury Street is included in the background papers.**
Historic Royal Palaces (13 May 2024 and 21 November 2024)	As guardians of the Tower of London WHS we write to object to the revised proposals for this site. It is evident from the submission material that the proposed development would have a significant damaging visual effect on aspects of the 'Outstanding Universal Value' (OUV) of the Tower WHS. On the basis of the information available on the City's website, our comments on

	the proposal are set out below and we would ask that these are considered in the Council's determination of the application. On 19th November 2020 we objected to the previous application for this site (20/00848/FULEIA) for which ICOMOS conducted a Technical Review and for which Planning Permission was refused. In our view, the reduction in the height of the building from 48 storeys to 43 storeys is not sufficient to mitigate the harmful impact on the OUV of the WHS and overcome the previous reason for refusal in this regard. Particularly on the attributes of the Landmark Siting of the Tower of London and on the Physical Dominance of the White Tower. In the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge it is imperative that adequate visual separation is maintained between the City Cluster and the White Tower silhouette. The proposal retains just a sliver of sky space to separate it, but of course this view, like any other, is not static: move a few metres north and the proposal would appear to rise directly out of the White Tower. The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower' Where it has been compromised its visual dominance has been devalued.' Regarding the background to the Tower, the LVMF guidance notes, 'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should

	not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site'. It should be borne in mind that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The new proposal for Bury House, would still inevitably increase the existing compromise of the free space around the White Tower. In Historic Royal Palaces' view, the damaging visual impacts are also evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA views 22 and 23), increasing the visual intrusion of the modern city skyline into the inner ward. A key impact of the proposed development would be that it would inevitably extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the burgeoning City. Although there has been a minor decrease in the proposals' height, it still creates an abrupt vertical cliff edge in LVMF 10A.1, rather than a stepping down into the 'foothills' of the Cluster. This is a contradiction in the principles being set out for the Cluster and the proposal is also still high enough to suggest that there should be a further continuation of the downward slope of the Cluster towards the White Tower – which over the years has pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.

	You will note that in their 2022 Technical Review, ICOMOS restated the position from the 2019 Review that “the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable 30 City of London ref: 18/01213/FULEIA 12 approach to allow further negative visual impact on the property’s integrity when it is already threatened.” This position still stands for the current application and the impact of the development as proposed would be of significant heritage harm to the setting of the Tower of London and the Outstanding Universal Value of the World Heritage Site. On this basis the proposals are contrary to the policies of the Local Plan, London Plan and NPPF, whilst the scheme does not deliver sufficient public benefits to outweigh the level of harm created. The Planning Statement submitted with the planning application relies significantly on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal. However, given that the draft plan remains at an early stage of preparation, having not been submitted or tested through examination, with significant objections remaining to the tall buildings policies and proposals in the draft document, it is evident that limited weight can be attributed to the draft plan in the determination of the application at this stage. Historic Royal Palaces therefore objects to the proposed development, which would be harmful to the OUV of the Tower of London WHS and we ask the City of London to refuse the application.

	<u>The letter received on 21 November 2024 stated the following:</u> HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS by virtue of the position and height of the proposed buildings and their impact on key views and the ToL. Growth of the City Cluster The growth of the CoL tall buildings cluster over the last 15 years, particularly the rapid development of new high-rise buildings, represents growth beyond that which was first envisaged when the LVMF was first published in 2012. The growth in tall buildings has resulted in cumulative impacts which HRP considers are threatening the OUV of the ToL WHS. HRP considers the emerging CoL Local Plan to 2040, which proposes additional height in the cluster, would further exacerbate the harm to the OUV through its promotion of an expanded eastern edge to the cluster and additional height. HRP believes that the Bury House development, along with the emerging CoL Local Plan 2040, to be a significant threat to the status of the WHS and as such maintains its objection both to this application and the emerging City Plan 2040. Harm to the OUV of the ToL WHS HRP remains of the view that the proposed development would harm the OUV of the ToL WHS. The original representation (May 2024) set out the unacceptable impact of the proposals on views of the Tower of London from Tower Bridge (LVMF 10A.1), in the dynamic journey across Tower Bridge, in the local views from within the inner ward of the Tower (in particular the view north-west from the centre of Tower Green over

	the roof of St Peter and Vincula), and on views of the White Tower, which is compromised by the erosion of the visual separation from the emerging City Cluster. This is contrary to the guidance of the LVMF, in relation to View 10A.1 which states that '*Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site'* (LVMF para 186). HRP notes the Townscape Consultancy response to the HRP comments made in May 2024. However, HRP maintains its position and does not agree with the conclusions in that response. In relation to View 9 in the TVIA (LVMF View 10A.1), HRP does not agree that 'in the cumulative condition the height of the proposed development would better mediate the cliff edge caused by the consented scheme at 100 Leadenhall'. HRP considers the height would in fact exacerbate the abrupt vertical cliff edge in this view, resulting in a domineering and overbearing relationship to the ToL White Tower in this view. In relation to the Townscape Consultancy comments on View 22, from the ToL Inner Ward, HRP maintains its comments. While the wire line shows the proposed development occluded in this view, the cumulative impact view in the TVIA clearly shows a development visible over the top of the Royal Chapel of St Peter and Vincula. This further highlights HRP's concerns about the growth of the city cluster overall and the damaging impact this is having on the ToL.

	The ‘Policy Considerations’ and ‘Changing policy context’ are included in the background papers. Misrepresentation of HRP comments on the emerging scheme HRP notes the statement in the Planning Statement (para 2.30) which refers to the way in which the 2024 submission seeks to address the reasons for refusal of the 2020 scheme: that ‘*The Applicant has also worked with key stakeholders including the GLA, Historic Royal Palaces (‘HRP’) and Historic England (‘HE’) to address the second reason for refusal. In this regard, HRP feedback acknowledged that there was “much to welcome in the new design proposals, particularly in respect of the existing incongruous extensions to Holland House, bringing public use to Holland House, and the reduction of height and introduction of shoulder elements to the tall building”, which were described as helpful in key views. It was acknowledged that the “height of the massing would reestablish a softer edge in the foothills of the City Cluster that would mitigate to some extent against the ‘cliff edge’ created by consented developments* ”. The Planning Statement concludes on this point (para 2.31) that there is ‘*consensus from the GLA, HRP and the HE that the height reduction represents a positive change from the previous scheme, but some concern remains in respect of the overall height of the scheme*.’ HRP takes issue with this presentation of its view of the current scheme, which overstates its assessment of the advantages of the current scheme compared with the previous rejected scheme, and suggests that its remaining concerns are minimal and entirely addressed in the Heritage Assessment, HTVIA and Design and Access Statement submitted as part of the current application. The quotes presented in the Planning Statement are from an email exchange

		immediately following an online presentation of the scheme by the Applicant to HRP, and omit other important issues raised by HRP in that email, including that '*the massing in LVMF view 10A.1 (from the northern bastion of Tower Bridge) still appeared tall and close to the White Tower'*. This position was set out in more detail in HRP's follow-up formal objection letter dated 13 May 2014. Historic Royal Palaces therefore continues to strongly object to the proposed development, which would harm the OUV of the Tower of London WHS and which therefore does not comply with CoL adopted or emerging Local Plan Policies, the LVMF and NPPF. We therefore request that the City of London refuses the application as currently presented. **<u>Officer response</u>: The matters in the Historic Royal Palaces objections are addressed in the Tall Building and Heritage and Strategic Views sections of this report.**
Surveyor to the Fabric St Paul's Cathedral		The proposals involve the construction of a new tall building to Bury Street, on the eastern end of the cluster. Whilst the development site is separated visually from the Cathedral by the bulk of the Cluster, the proposals will still be appreciable in key views of St Paul's (as identified within the Heritage, Townscape and Visual Impact Assessment - HTVIA) and thus form part of its setting. We would therefore query why an assessment of the significance of the Cathedral (including the contribution made by its setting) and subsequent heritage impact assessment was not explicitly included in the application documents, either within the HTVIA prepared by The Townscape Consultancy or the Heritage Statement prepared by KM Heritage. We would suggest that such assessment should be included in the submission

	documentation as a matter of due course given the exceptional significance of the Grade I listed building and the evolving nature of its setting. If this assessment is not included, we consider that explicit mention should be made of why the Cathedral was scoped out of assessment in order to fully understand the extent of potential heritage impact. We do, however welcome the inclusion of key views of the Cathedral outlined in the 'Visual Assessment' section of the HTVIA. Whilst we understand that the proposals are located on the eastern side of the cluster and a 'partial' ZTV is included as an appendix to the HTVIA, the inclusion of a ZTV that covers a wider area would be of great assistance in understanding the extents of potential visual impact, and why certain strategic views (such as view 15B.2) were not taken forward for assessment. Fleet Street views are not included within the HTVIA. However, the Processional Way along Fleet Street is an incredibly sensitive area of the setting of the Cathedral in terms of potential heritage and visual impact. We would therefore also seek to be assured that there is absolutely no visual intrusion within views of the Cathedral from Fleet Street. Wider Considerations: Bevis Marks We have confined our observations on this application to our primary locus (ie concern for the heritage and setting of St Paul's) and our well established planning application review methodology. However we also feel we would be remiss in not making mention of the evident impacts that this major development proposal has on both the Tower of London (WHS) and Bevis Marks Synagogue. The City Planning and Transportation Committee refused consent for an earlier proposal – which,

	to most observers, is more or less similar to the current application. The committee determined that the impact on the heritage and setting of two highly significant and sensitive Grade 1 listed heritage assets were found to be unacceptable. Accepting that other commentators and critics, including Historic England, will be better placed to advise Planning Committee on the methodology and evaluation of impacts of this development on Bevis Marks especially: the main observation that we wish to add to our comments here is in relation to the definition and understanding of 'setting'. There is very good guidance from HE on evaluation and consideration of managing significance, which includes 'setting' in GPA 1 and 2. We feel that it is important to note that, whilst the Tower and St Paul's are (in different ways) privileged with specific heritage management policies that broadly recognise these internationally significant heritage assets, Bevis Marks has to argue a case for 'Protection, Preservation and Celebration' within the rubric of the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990. All participants will rightly be concerned with seeking a better and shared understanding of the heritage setting of the Synagogue and, to date, it would appear that the regulators and proposers of this scheme have not yet arrived at a shared understanding of setting and the significance thereof. This important consideration might have been addressed by EIA Scoping. Where the interests of St Paul's and those of Bevis Marks intersect, we suggest and as noted above, is that this application before committee does not appear to be supported by sufficient or proportionate evidence and expertise in relation to the full and correct evaluation of the heritage context into which this major project intrudes. We

	would therefore urge officers and Committee to allow for these necessary data to emerge to inform any determination. Conclusion We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward. We would be happy to review any additional information submitted to better understand potential impacts. **Officer response: The matters raised above are addressed in the Tall Buildings and Heritage and Strategic Views sections of the report.**
Twentieth Century Society (letter dated 17 May 2024 and email dated 11 November 2024, maintaining their objection)	It is the view of the Society's Casework Committee that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The 3 additional storeys would add considerable heaviness and bulkiness to the building's roofline. This extension would change the building's proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant's HTVIA views 42, 43 and 60. The proposed extension would also have a harmful impact on the building's fabric and on the character of its interior spaces, namely through the infilling of its lightwell. The Society also has serious concerns about the proposed ground plus 43-storey office tower development to Bury House and its impact on the significance of Holland House. The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the proposed development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and we are concerned that even more fabric would be removed as part of the current

		application, we are also concerned about the proposed insertion of a large stair to connect the ground and first floor level and its impact on the interiors here. We have concerns about the cumulative impacts of pervious and proposed changes on the significance of this Grade II* listed building. The proposed ground plus 43-storey office would also clearly impact on the setting of Holland House – it would rise up directly behind the building and would appear to overshadow it. This is illustrated in the applicant's illustrative CGIs and views within its HTVIA. We accept that the proposed height of the office has been reduced from the previous application (which proposed a ground plus 48 storey tower) but a reduction of five storeys has done little to reduce its impact on the surrounding built environment. It was on account of this impact on heritage that the previous scheme was refused, the planning/heritage context has also changed since the previous application. This area a very recently been designated the Creechurch Conservation Area which makes the site even more sensitive to change and even harder to justify such tall development here. These aspects of the scheme would majorly harm the significance of Holland House. We do not feel that this harm is mitigated by the few positive interventions proposed as part of the scheme, which includes restoring the elevations, replacing non-original windows with units closer to the originals, reinstating the blocked-in Bury Street entrance and conserving original interior finishes. There benefits could be delivered through a scheme which has a much less harmful impact on the site's heritage, we would seriously challenge the applicant's claim that remedial work to the elevations (which has already been approved by the local authority) could only be delivered through the wider redevelopment of the site (we refer to paragraph 2.32 of the planning statement).

	For the reasons outlined in this letter, the Society strongly objects to the proposal sand recommends that the local authority refuses these damaging applications. We do not object to adapting Hollan d House for office use nor to the redevelopment of the Bury House site in principle but take issue with the approach proposed and would like to see a more conservation-led scheme forward. **<u>Officer response</u>: Comments noted and are addressed in the Architecture, Urban Design, Public Realm and Heritage sections of the report.**
The Victorian Society	Strongly Object. Significance and Harm Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage. It is considered a key transitional building between the Art Nouveau and Art Deco styles, noted for its faience cladding, its sculpted corner resembling the bow of a ship, and its elaborately tiled entrance lobby. The heritage asset also forms a key building within the newly established Creechurch Conservation Area. Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building positively contributes to the immediate setting of Holland House and the Creechurch Conservation Area. The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the

	complete removal of the top floor of Holland House, causing less than substantial harm. To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building's fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset. Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset. The construction of a 43-storey building at 31 Bury Street would negatively impact the surroundings in which these heritage assets are experienced. The scale of the proposal would have the effect of overpowering the assets by absorbing them into the wider proposal, affecting the ability to appreciate the individual significance of both Holland House and Renown House. Creechurch Conservation Area The proposed scale and design of the development would have a far-reaching effect on the appearance and special architectural and historic character of the Creechurch Conservation Area, defined by intricate lanes and medium-rise buildings. This proposal would compromise this character by introducing an inappropriate scale and materiality, affecting the predominant setting of a number of designated and undesignated heritage assets, causing less than substantial harm to this conservation area,

	and damaging one of the key aspects of its significance. 1990 Planning (Listed Buildings and Conservation Areas) Act: The application simply fails to adequately preserve a building of special architectural and historic interest due to the loss of historic fabric, disruptive additions, and the compromise of its immediate setting, in addition to the wider negative impact on a conservation area. **<u>Officer response</u>: Comments noted and are addressed in the Architecture, Urban Design, Public Realm and Heritage sections of the report.**
LAMAS - Historic Buildings and Conservation Committee	The LAMAS Historic Buildings Committee object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) We have written on two previous occasions in 2021 expressing our objections to the planning applications submitted for 20/00848/FULEIA Bury House, 31 Bury Street, London, EC3A 5AR. As you will know, this scheme was subsequently refused in June 2022, with the reason cited as: 1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal).

	2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site, as highlighted by Historic England in their letter of objection. The City of London Local Plan January 2015; Policy DM 12.2 Development in conservation areas identifies that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area. 24/00011/LBC (Holland House 1 - 4, 32 Bury Street) Holland House is a Grade II* listed building first listed in June 1972 and amended in September 1997. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys. The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. Policy DM 12.2 Development in conservation areas, para 3.12.10 further identifies that: In the design of new buildings or alteration of existing buildings, developers should have regard to the

	size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale. Policy DM 12.3 Listed buildings states: 1. To resist the demolition of listed buildings. 2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Para 3.12.14 further identifies that: Where extensions are proposed, in order to be acceptable, they should be located where they minimise the effect on the listed building concerned, and should always be appropriate in scale and character. The bulk, height, location and materials of roof extensions will be particularly critical and should be appropriate to the period and style of the building and its setting. This has been reinforced by the establishment of the Creechurch conservation area, which encompasses both the Grade II* Holland House and the Grade I listed Bevis Marks synagogue. The application 24/00021/FULEIA for the demolition of Bury House and erection of a new building is, in our opinion, materially of little difference to the previous 2020 scheme. The committee therefore still remain of the opinion that: 1. The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will still profoundly harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings. The reason as stated in paragraph one of the letter of rejection therefore still relates.

	2. Whilst it is acknowledged that the proposed building has a slightly amended profile, we do not consider that this provides sufficient mitigation to change the less than substantial harm on the London View Management Framework view as stated in paragraph two of the letter of rejection. The application for listed building consent 24/00011/LBC for the partial demolition of the Grade II* Holland House and the construction of four further storeys would cause a significant detrimental effect on the Grade II* listed building, in contravention of Policy DM 12.3 Para 3.12.14 The proposed development is within the Creechurch conservation area, and in the opinion of the committee, will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2. For the reasons set out above, the LAMAS Historic Buildings Committee therefore continue to object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. **Officer response: The matters raised are addressed in the Tall Building and Heritage and Strategic Views sections of this report.**
Historic England, Greater London Archaeological Advisory Service (letters dated 2 April 2024 and emails received on 10 October 2024 and 7 November 2024	Assessment of Significance and Impact: The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains

confirming that the additional information did not affect the original advice)	have been lost due to deep basement construction or other groundworks. The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school. All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk-based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation. The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are

		proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here. It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented. A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City. <u>Recommendations</u> I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider archaeological conditions could

	provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. **Officer Response: The recommended conditions are included in the conditions schedule. A full assessment of the archaeological implications of the proposal are set out in the archaeology section of this report.**
London City Airport (letters dated 19 March 2024, 15 October 2024 and 1 November 2024)	This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found to have the potential to conflict with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests a condition relating to the following are applied to any approval: - Building Obstacle Lighting Also, the following observations have been made: - City Aviation Authority Building Notification - City Aviation Authority Crane Notification **Officer Response: The recommended condition have been included in the conditions schedule.**
Heathrow Airport (letter dated 20 March 2024 and emails dated 9 and 31October 2024)	No safeguarding objections to the proposed development. However, if a crane is needed for installation purposes, the applicant's attention is drawn to the following: CAA Crane Notification: Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification The following details should be provided before the crane is erected: • the crane's precise location • an accurate maximum height • start and completion dates **Officer Response: The advice has been included as an informative.**

London Gatwick Airport (letter dated 03 June 2024)	No response
NATS Safeguarding Office (email dated 15 March 2024)	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. **Officer response: Comment noted.**
Environment Agency (letters dated 26 March 2024 and letters dates 18 October 2024 and 15 November raising no further comments)	Based on the information provided the application raises no environmental concerns. The Environment Agency therefore have no comments on the application. Advice is given in respect of water resources and water efficiency. **Officer Response: Comments noted. The Environment Agency's advice is available to applicant to take into consideration.**
Natural England (letter dated 8 May 2024 and email dated 4 November 2024 stating that the advice provided in their previous response still applies)	No objection. Based on the plan submitted, Natural England considers that the proposed development would not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. **Officer Response: Comments notes.**
Environmental Health / Markets and consumer protection (letter dated 9 October 2024)	Raised no objections. Conditions are recommended including a Scheme of protective works during demolition and construction, including monitoring by officers, restrictions on servicing hours and roof terrace use hours, submission of an acoustic report and restriction on operational noise and plant noise, details of soundproofing, details of fume extraction, details of contamination investigations.

Environmental Resilience Officer (letter dated 14 March 2024, updated response 30 August 2024)	<u>Overheating and the urban heat island effect</u> Section 8.3 within the CCRSS covers the risk of heat stress and assesses the following hazards: - Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk) - Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk) - Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk) - High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk) - Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk) - Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk) - Increased risk of damage to building materials (Moderate Risk) To manage the above risks, the CCRSS states that the following design features and techniques will be included: - Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources - Facade and building services have been designed with a fan coil cooling solution - Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling - An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:

	• All ground level conditions were suitable for intended use, or no worse than the baseline conditions. • The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe. • Conditions for all existing off-site terraces are suitable for the intended use. • Conditions for all proposed terraces are suitable for the intended use - Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present - Building maintenance strategy will be implemented to check and treat materials for UV damage - Materials on exposed areas will be designed and installed to weather effectively - Structural foundations and frame have been designed to accommodate a range of soil stiffness values - All heat stress hazards residual risks have been assessed as Low. **<u>Flooding</u>** Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards: - Rising sea levels could increase the risk of flooding to the building and the surrounding area (High risk) - Increased duration of prolonged rainfall could cause an increased risk of surface water flooding (Very High risk) - Increased risk of flooding causing significant damage to the development and requirements for weather proofing (Moderate risk) The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year

	event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low. **Water stress** Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards: - Increased risk of drought (Moderate risk) - Increased duration of prolonged rainfall could cause impacts on structural stability within the building (Moderate risk) - Risk of material degradation due to extended exposure of building materials to increased moisture levels (Moderate/ low risk) - Increased risk of extended duration of water stress and high water costs (Moderate risk) In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks: - Project will prioritise native, locally sourced plants for the public realm landscape strategy - Landscape strategy supported by ecologists and landscape architect's recommendations such as appropriate species which are resilient to periods of water scarcity - Roof drainage will be used for irrigation of green walls and roofing - SuDS in the form of blue roofs and tanks will attenuate rainfall - Site is not at risk from groundwater flooding - Lowest level basement slab will be designed for Grade 3 waterproofing which will protect against future risk - Internal linings proposed in retained basements

	- Efficient water fittings installed to reduce water consumption All water stress hazards' residual risks have been assessed as Low. The FRA & DS states that "roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants." **<u>Biodiversity and pests and diseases</u>** Section 8.4 of the CCRSS assesses the risk to natural capital and includes the following hazard: - Risk of loss of biodiversity and high quality green space (Moderate Risk) The CCRSS states this risk will be managed through: - Introducing increased vegetation on site, in green roofing, terrace planting and public realm planting - Habitat infrastructure such as bird and insect boxes to be installed - Project will prioritise native, locally sourced plants for the landscape strategy The CCRSS classes the residual risk as Low. Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards: - Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to humans (Moderate Risk) - Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to plants (Moderate Risk) The CCRSS states this risk will be managed through: - Implementation of a pest management plan or implementation of an accredited Pest Management program

	- Regular monitoring and maintenance of ventilation systems - Consideration of new warm-climate pests will be factored into final species selection for planting The CCRSS assesses the residual risk to be Moderate /Low. A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed. A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through: • New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment; • Provision of flexible community/education/cultural space meeting an identified need in the area; • 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area; • A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above); • Provision of new open space at James' Court and external building terraces providing much needed amenity provision;

	• Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment; • Inclusivity and accessibility as placemaking principles; • Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity; • The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards • BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures **Food, trade and infrastructure** The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure. **Recommendation:** The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.
Lead Local Flood Authority	Raised no objections. Recommended 2 conditions: Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to

	this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m3 ; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: A Lifetime Maintenance Plan for the SuDS system to include: • A full description of how the system would work, it's aims and objectives and the flow control arrangements; • A Maintenance Inspection Checklist/Log; • A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

Air Quality (Memo dated 08.05.2024)	Email dated 2nd April states no further comments aside from those already sent across (can't see these), and AQ Positive statement is acceptable. - SJ – I asked DP9 to respond to Paul's comments dated from May (SJ 01/10/24) **Officer Response: The recommended conditions have been included in the conditions schedule.**
City Police	The City Police provided a number of comments and advice to the applicant. This includes ensuring there is sufficient access controls into different areas of the buildings and at different times, sufficient natural and formal surveillance and sufficient safety and management of accessible terraces. **Officer Response: Details of security an anti-terror measures are recommended to be secured by condition and in the S106 agreement.**
Transport for London (Infrastructure Protection, letters dated 9 April 2024 and 11 October 2024)	London Underground/DLR Infrastructure Protection has no comment to make on this planning application.
Crossrail Safeguarding (letters dated 25 October 2024 and 1 November 2024)	The application relates to land outside the limits subject to consultation by Crossrail Safeguarding Direction.
Active Travel England (emails dated 20 March 2024, 9 October 2024 and 30 October 2024)	In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which

	recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. **Officer Response: TfL have been consulted on the application.**
Royal Parks	Having reviewed the Heritage Statement submitted in support of this planning application, we believe that although the development may not be visible form The Regent's Park and St James's Park, it will be visible from Greenwich Park. This includes the view from the General Wolfe statue, which is a protected view, as set out in the London Plan. In light of our charitable objects, TRP is concerned that the additional massing of the proposed development would be detrimental to the views and visual amenity experienced by visitors to the aforementioned Royal Parks. We therefore object to this planning application and hope that our comments will be considered in your determination. **Officer response: The matters are addressed in the Heritage and Strategic Views sections of this report.**
Thames Water (letter dated 30 January 2024)	Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a condition for pilling methos statement to be imposed. Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk

	Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Measures should be taken to minimise groundwater discharges into the public sewer. There are public sewers crossing or close to your development. If significant work is planned near our sewers, it's important that the applicant minimizes the risk of damage. Thames Water would advise that with regard to the combined waste water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. Water comments Water Comments There are water mains crossing or close to your development. Thames Water do not permit the building over or construction within 3m of water mains. If significant works are planned near Thames Water mains (within 3m) they'll need to check that development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The proposed development is located within 15m of Thames Water underground water assets and as an informative is suggested to ensures that appropriate measures are taken into consideration. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to

	agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that a condition is added regarding potential water network updates to ensure sufficient water pressure and capacity. **Officer comments: The piling method statement conditions and network updates to ensure sufficient capacity are imposed in the conditions schedule. Suggested informatives are also recommended.**
City of Westminster (letter dated 3 April 2024 and 8 October 2024)	The City Council has considered the proposals and does not wish to comment.
London Borough of Camden (letters dated 20 March 2024 and 15 November 2024)	No objection to the proposal. The application site is a significant distance from the London Borough of Camden boundary. The development would have no impact on the significance of the protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental or ecological conditions. **Officer comments: Comments noted.**
London Borough of Tower Hamlets (letters dated 14 May 2024 and 11 November. In their second letter they state that they maintain their original objection)	LBTH previously voiced strong objections to a similar application at Bury House, 31 Bury Street, between 2020-2021 (City of London ref: 20/00848/FULEIA and LBTH refs: PA/20/02417, PA/21/00436, and PA/21/01930). These concerns remain. While it is noted that the current proposal now includes adjacent Holland House (Grade II*) and Renown House, our primary concerns pertain to the replacement building for Bury House. Despite minor adjustments, the replacement building maintains its design as a tall, slender tower situated to the southeast of the Gherkin. Although the maximum height has been

	marginally reduced from 197.94m AOD to 178.7m AOD, and a stepped form introduced to the upper sections, these modifications do little to alleviate the impact on the Tower of London World Heritage Site (WHS). As illustrated in LVMF View 10A.1 in Figure 5.4 of the Tower of London Heritage Impact Assessment, despite the reduced height and massing, the proposed development would still disrupt the clear sky gap between the City Cluster and the Tower of London, encroaching inappropriately and competing with the iconic White Tower. Consequently, LBTH maintains its objection to the proposals, expressing concerns that, even with amendments, the proposed development would significantly and detrimentally affect the setting of the Grade I listed Tower of London WHS and its townscape views. These proposals severely risk diminishing the ability to appreciate the Outstanding Universal Value of the Tower of London WHS. **Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.**
London Borough of Richmond Upon Thames	No response.
Royal Borough of Greenwich	No response.
London Borough of Lambeth	No response.
London Borough of Southwark	No comments raised.
SAVE Britain's Heritage (letters	SAVE Britain's Heritage strongly objects to the above planning application for Bury House 1-4,

dated1 May 2024 and 6 November 2024, stating that the revisions do alter the fundamental nature of the application and their views expressed initially are maintained.)	31-34 Bury Street on the grounds that this proposal would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area which is designated to protect multiple highly listed heritage assets and their character. SAVE also strongly objects to the total demolition of Bury House on climate grounds. We further note that a previous scheme for a 48-storey tower at No. 31 Bury Street was already refused permission in 2022 (ref no. 20/ 00848/ FULEIA) on the grounds that the development would overbear and overshadow the Bevis Marks synagogue. For these reasons, this application fails to comply with national and local policy for preserving the historic and natural environment of the City of London, and so we call on the Local Planning Authority to refuse planning permission. Assessment 1. Substantial harm to Bevis Marks Synagogue SAVE considers that the proposed 43-storey tower at No. 31 Bury Street will cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The proposal will fundamentally alter the streetscape around this highly designated asset which is of exceptional historic value. The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Further to this, Para 206 NPPF (2023) provides that any harm to the significance of a heritage asset, including its setting, requires clear and convincing justification. SAVE contests the applicant’s claim in the Heritage, Townscape and Visual Impact Assessment [para 8.134] that “only the immediate setting of the Bevis Marks Synagogue contributes to its significance”, to be insufficient to comply with Para 206. Historic

	England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic Environment (2015) sets out that, "setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage". We consider that the proposed 43-storey tower, which would be visible from within the courtyard of Bevis Marks synagogue, has a direct and substantially harmful impact upon the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior. We wish to highlight the reason for refusal of application 20/00848/ FULEIA which found that a tall building at No. 31 Bury Street would "affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue". This proposed development contravenes local as well as national policy. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. More specifically, Policy HE1 [Managing Change to the Historic Environment] of the emerging City Plan 2040 recognises that the Bevis Marks Synagogue requires, "special consideration and protection, given their outstanding architectural and historic significance and...the critical contribution of elements of setting to that significance." We call upon the LPA to refuse a planning application which fails to comply with national and local policy and contradicts the emerging City Plan 2040. 2. Substantial harm to the Creechurch Conservation Area (CCA) The application site, whilst within the City Cluster, is fully within the Creechurch Conservation Area which was newly designated in January 2024.

	Policy CS14(2) of the City of London Local Plan (2015) states that planning permission for tall buildings will be refused within inappropriate areas, such as conservation areas. Policy S12 [Tall buildings] of the emerging City Plan (2040) elaborates that “tall buildings must have regard to... the significance of heritage assets and their immediate and wider settings”. We strongly object to this proposal on the grounds that it would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. At 43- storeys, the proposed tower would overshadow a number of highly designated heritage assets, which include three buildings of the highest possible listed status, which the conservation area is designated to protect. We consider the tower, which would be located directly behind Holland House and Renown House, would diminish the primacy and appreciation of these buildings. The drastically increased scale from the present 7-storey Bury House would compound this harm. In the absence of a formal Appraisal and Management Plan yet to be adopted, we refer to The Proposed Bevis Marks/ Creechurch Conservation Area (2022) draft documentation which recognises 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 building” (p. 3, para 1.02). The erection of a tower within the CCA would erode its low scale, harmonious townscape. This is unsupported by local policy. Policy CS12(2) of the City of London Local Plan (2015) requires that to conserve the significance of the City’s heritage assets, the distinctive character and

	appearance of the City's conservation areas will be preserved and enhanced, while allowing sympathetic development within them. This proposed application cannot be considered sympathetic development. 3. Substantial Harm to Holland House and Renown House The works proposed to Renown House and the Grade II* listed Holland house (in the associated application 24/ 00011/ LBC) are strongly concerning. We recognise that the rooftop alterations to Holland House are later additions, not contemporaneous with the original 1916 building. However, they are sufficiently set back from the building's facade to be considered largely unobtrusive when viewed from the streetscape. The proposed 4-storey roof top extension is an increase in scale and massing which would overwhelm Holland House and detract from an architectural appreciation of the building. The extension of Renown House by a storey, and the realignment of the floor plates to connect with Holland House constitutes further, drastic alteration which, when as read a whole, amounts to substantial harm. Para 207 NPPF (2023) provides that, "where a proposed development will lead to substantial harm to...a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm". We do not consider that the purported public benefits from this development can outweigh the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31 Bury Street. 4. Views of the Tower of London

	The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Whilst we acknowledge a reduction in height from the previous application 20/00848/FULEIA, we do not consider this sufficient to mitigate the adverse impact on the setting of the Tower of London. Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements, also stating that: "they should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views". The scheme cannot be considered in compliance with this policy. 5. Unsustainable development This application cannot be considered sustainable development. The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 157 NPPF (2023) and Policy CS15 of the City of London Local Plan (2015) which provides that the demolition should be avoided through the reuse of existing buildings and their structures. This development would further contradict emerging policy which recognises the wider benefit in heritage terms of the retrofit first approach. The City of London Corporation is currently consulting on Planning for Sustainability Supplementary Planning Document (SPD). Chapter 3 [Retrofit and Reuse] states that, "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". We consider this application fails to meet national and local policy on sustainability grounds and runs counter to emerging guidance on sustainable development. Conclusion For the reasons outlined above, SAVE objects to this planning application on heritage and climate grounds, and we call on the Local Planning Authority to refuse planning permission. **Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture, Heritage and Strategic Views and Sustainability sections of this report.**
Historic Buildings and Places	Object to the proposal. Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage for a shipping company. Berlage was a major architect in the Netherlands and Holland House was a rare commission in England. Berlage took inspiration from the works of pioneering American architect Louis Sullivan. It is noted for its pronounced vertical ribs, faience cladding and its elaborately tiled entrance lobby, and is one of the first steel framed structures within the City. Holland House is also a key contributory building within the newly established Creechurch Conservation Area. The adjacent Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building contributes to the setting of Holland House and character of the Creechurch Conservation Area.

	HB&P objects to the proposed four-storey extension to both Holland House and Renown House. It is an intrusive, bulky, and top-heavy addition to both buildings that fails to respect their proportions and scale. The extension would result in the loss of historic fabric, particularly within Holland House at roof level and the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest. The construction of the 43-storey tower at 31 Bury Street would have a significant impact on the appearance and special architectural and historic character of the Creechurch Conservation Area. The concept of a tower with a conservation area predominantly characterised by low and medium height buildings would compromise this character and cause irreparable harm to the setting of several key listed buildings, including Holland House and the Bevis Marks Synagogue. Policy: The total inappropriateness of a tower within a conservation area is clearly stated in the City of London's Adopted Local Plan (2015), notably Core Strategic Policy CS10: Design, which requires "that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces". Policy CS14: Tall buildings states "Refusing planning permission for tall buildings within inappropriate areas, comprising of conservation areas". Chapter 16 of the NPPF (2023) manages change within the historic environment. Paragraph 205 states that "When considering the impact of a

	proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation". And at Para 206: "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." Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Recommendation: The proposal is clearly contrary to the local plan and to national planning policy by virtue of the tower's scale and height, and by the extent and bulk of the alterations and additions proposed to the grade II* Holland House. It should therefore be refused. **Officer Response: Comments are noted. The impact of the development on heritage assets is assessed in 'Design and Heritage' section of the report.**
The Georgian Group (letter dated 8 May 2024 and email received on 24 October 2024 advising that the additional information does not address their original comments)	Summary The Georgian Group objects to the applications for Planning Permission and Listed Building Consent. The Group's statutory remit is 1700-1840 and it is only buildings within that period referred to in this letter. For buildings outside this period, the Group defers to the expertise of our sister national amenity societies. The location, height and massing of the proposed development would cause considerable harm to the significance of Bevis Marks, St Botolph's Church and the Creechurch Conservation Area. The proposed development is defined as a tall

	building and therefore in line with policy CS14 of the existing local plan should not be permitted within a conservation area. Consequently, the development would be contrary to policy D9 of the London Plan. The height and massing of the building would cause considerable harm to the three heritage assets referenced above and is therefore contrary to legislation as well as national and local policy relating to heritage assets. The Georgian Group is aware of the consultation on the proposed City Plan 2040 and will be making representations to address specific concerns with the plan. Proposals and Their Impact Bevis Marks Synagogue The courtyard wrapped around Bevis Marks should be seen as an extension of the building due to the vital liturgical function it plays in the workings of the synagogue. The courtyard forms the immediate setting of the building and allows visitors to appreciate the unique setting and appearance of the building. The setting of Bevis Marks contributes greatly to the significance of the building, allowing light into the synagogue which is integral to the practices of Judaism. The proposed development as shown within the submitted HTVIA would be a dominating visual intrusion on the courtyard and setting of the synagogue. Views 45a and 45b show the impact the proposed tall building would have on the setting of Bevis Marks and the synagogue. The height, massing and positioning of the proposed tower would have an overbearing impact on Bevis Marks harming the setting and the ability to experience the building. Owing to the impact the proposed tall building would have on the setting of Bevis Marks the

	level of harm would be towards the higher end of Less than substantial due to the importance of the setting and the potential for reduced light. St Botolph Without Aldgate The spire of St Botolph's church is prominent within the local environs and views within the Creechurch Conservation Area. It is identified within the City of London Protected Views SPD as being a church with a 'skyline presence'. The prominence of St Botolph's spire can be appreciated from along Aldgate High Street looking West and from the Minories looking North. Kinetic views of St Botolph's and its spire are permitted when moving around the Creechurch Conservation Area and the wider surroundings which all contribute to the significance of the building. The applicant has provided views towards the church within the submitted HTVIA on pages 189-194 and identified as views 38 and 39. View 38 is situated along Aldgate High Street and shows the proposed development rising above One Creechurch Place, a building which harms the setting of the church and detracts from the interest of the Creechurch Conservation Area. The cumulative view shows the proposed tall building grouped in with 100 Leadenhall Street and 1 Undershaft. The height, massing and proximity would challenge the landmark quality of St Botolph's Church which is more evident within view 39 situated further east along Aldgate High Street. The impact of the towers would be further exacerbated in kinetic views along Aldgate High Street where the proposed development would be visible in the skyline behind the church. The positioning of the tower in relation to the spire of St Botolph's would challenge its presence on the city skyline and be a distraction in views down Aldgate High Street. Both the presence of the spire and views towards the

	church contribute to its significance and therefore the proposed development would cause an element of harm to St Botolph's Church. This harm would be at the low-middle level of less than substantial harm. Creechurch Conservation Area Views within the Creechurch Conservation Area contribute considerably towards its significance and allow for the special interest of the area to be appreciated. As referenced above concerning Bevis Marks and St Botolph's, the impact on those individual assets is similarly applicable to the wider character and appearance of the Creechurch Conservation Area which the proposed development would cause harm to. The special interest associated with the Creechurch Conservation Area is closely related to the three places of worship situated within the area. The proposed development would harm the ability to appreciate two of those in Bevis Marks Synagogue and St Botolph's Church which fall within the Georgian Group's statutory remit. The Group defers to the expertise of our sister National Amenity Societies on buildings which fall outside of our remit. A further characteristic that contributes to the special interest of the conservation area is the proliferation of historic open spaces including the courtyard of Bevis Marks Synagogue. The proposed development would have a negative impact, as referred to above, on the courtyard of Bevis Marks, and the churchyard of St Botolph's owing to the impact on their setting which in turn would cause harm to the character and appearance of the Creechurch Conservation Area. It is evident from the views submitted within the HTVIA that the proposed development would pose an incongruous element to the area and

	would harm the prevailing character and appearance of the Creechurch Conservation Area. The level of harm would be at the upper end of less than substantial harm, boarding on substantial. The Georgian Group's Recommendation The proposals would cause harm to the significance of Bevis Mark Synagogue, St Botolph's church and the Creechurch Conservation Area and would therefore be contrary to legislation as well as national and local policy as set out above. The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority. In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990. **Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.**
Conservation Area Advisory Committee	The Committee strongly objected considering that the development proposals would result in the gross overdevelopment of this site in the Creechurch Lane Conservation Area, with a significantly negative impact on the character and appearance of the immediate Conservation Area and its setting. The proposals were considered to be highly damaging to the local townscape quality in the nearby streetscene context, with harmful consequences for important listed buildings that were in close proximity. The lack of architectural quality and refinement of the

	proposals was noted, together with their significant negative impact on wider townscape views and heritage context of the site's City/central London location. **Officer Response: Comments are noted. The impact of the development on heritage assets is assessed in in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.**
Society for the protection of ancient buildings (letters dated 14 May 2024 and 6 November 2024, reiterating their objection)	The SPAB has been made aware of the above application and is writing to register its strong objection on the basis of the serious harm that would be caused to the Bevis Marks Synagogue and the Creechurch Conservation area. The proposal for a 45 storey office block at 31 Bury Street bears striking similarities to the highly controversial scheme which was refused by your authority in 2022. The major area of difference would appear to be the justification offered by the applicant for the scheme. Much is made of the new building's sustainability credentials, the economic benefits that would flow from it, and the provision of space for a variety of community uses. In our view, these arguments are tenuous at best and do not provide adequate justification for the substantial harm that would be caused to the Synagogue and the conservation area. Any new building of the type proposed would be expected to demonstrate solid sustainability credentials, so this cannot be considered as a determining factor when weighing justification against harm to an exceptional heritage asset. Also, and quite simply, the most sustainable building is one that already exists and we cannot see that the applicant has fully understood or explained the total carbon lifecycle cost of the proposed development. We are also not convinced that there is a requirement for community usage on the scale envisaged by the applicants, and indeed the location of our own offices in the City of London allows us to

	witness on a daily basis the many underused and often cavernous 'community' spaces that now occupy the ground floor of tall buildings at the expense of genuinely useful and affordable small scale businesses and community premises. The previous application was rightly refused by your Planning Committee based on the serious harm that would have been caused to the Synagogue. To that harm must now be added the very damaging impact on the newly designated Creechurch Conservation Area that would result if the application were granted. The height, scale, and mass of the proposed tower would overwhelm the Conservation Area and cause a high level of harm to key views. We cannot think of any precedent that would support your Authority in granting a permission that would be so clearly in contravention of the requirement of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that special attention must be paid to the desirability of preserving or enhancing the character or appearance of the area. Indeed, doing so would set a very damaging precedent. The SPAB urges that the application be refused by your local authority. **Officer Response: The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.** **The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. This offer is considered being unique taking into the wide variety of uses and flexibility of space. The benefits of the proposed development against the identified less that substantial heritage harm are assessed in the Assessment of Public**

	Benefits and paragraph 208 NPPF balancing exercise section of the report. **The Whole life-cycle carbon emissions of the proposed development are assessed in the Sustainability section of the report.**

Letters of Representation

56. One thousand, four-hundred and twelve (1412) letters of objection have been received from members of the public, and various organisations.

57. The responses from non-statutory organisations who have objected are set out below:

Example representations from (non-statutory) organisations, groups and individuals (objections)	Comments and Officers Response to Comments
Rabbi Morris (Bevis Marks Synagogue)	I'm writing to object in the strongest terms to the proposed redevelopment at 31 Bury St. I write as a private resident in the City of London and as the rabbi of the Bevis Marks Synagogue. I object due to the substantial harm the proposed tower would have on the functioning and viability of the synagogue, its Heritage Centre, its enormous heritage value, and on me as a local resident. The developers treat the synagogue as a heritage asset but fail to address the harm their proposal would cause to the synagogue's primary function as a house of worship and community space. The harm caused by this proposed development, both in its own account and due to the cumulative effect of previously built and consented tall buildings around the synagogue, puts at risk the core purpose of the Bevis Marks Synagogue as a fully functioning place of Jewish worship. Thus, the harm that

	puts this at risk must be classified as substantial harm, or even total loss of significance. Before delineating my concerns, it is necessary to state that this process has caused significant distress within the Jewish community. Any consultation would be challenging, but to have to repeat this process for an application which is clearly inappropriate and has already been rejected is oppressive in nature. In fact, this is now the fifth consultation that our community has needed to engage in over these matters over the past two years. Each consultation further drains our resources and places an immense burden on our community. We are disappointed that repeated efforts to work collaboratively with the Corporation have failed to result in policies that prevent this kind of harmful application from coming forward, something which we earnestly hope can still be rectified. **Officer Response: The comments are noted and mainly addressed in the Heritage, Environmental Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. It should be noted that the LPA's role is to assess the applications that are submitted for determination. The LPA cannot control or preclude the submission of an application. With regard to the formation of the local policy framework, it is noted that this is outside this application process and there are separate guidelines and legislation assessing its processes and procedures.** For clarity, each time we seem to have achieved a desired result, the Corporation has pulled back. 1. When proposing a Conservation Area, there was an inexplicable attempt by the Corporation to exclude 31 Bury St from this area. 2. Only weeks after adopting the CA with 31 Bury St included, the Corporation published its draft local plan which proposes to remove a previous

	restriction on tall buildings in Conservation Areas. 3. In putting forward an 'immediate setting' protection scheme for the synagogue in the draft local plan (a concept invented by the City, which has no legal status), the City has attempted to deny the impact of a tower at 31 Bury St on the synagogue, despite robust professional representations made by scholars to explain the harm that a tall building at that site would cause. While the policy gives the impression of protecting the synagogue, in effect it justifies substantial harm to it. In total, these moves may be construed by some to be in support the applicant, despite the harm their proposal would cause to the synagogue. I hope this has not been willful, but it does reflect a general ignorance for Judaism and Jewish culture, a serious inadequacy for the City which I hope this consultation will help with addressing. I now attempt to explain my views in an organised manner. **Officer Response: Comments noted. It is not considered that this report and the assessment of the current application is the appropriate process to consider or comment on the formulation of Planning Policy or on the designation of Conservation Areas. In determining the application the CoL must comply with the Public Sector Equality Duty, in accordance with section 149 of the Equality Act 2010. That duty is considered later in this report.** 1. It is difficult to overestimate the significance of Bevis Marks Synagogue as the first purpose-built Jewish house of worship in England following the 1656 resettlement. It is also the only non-Christian house of worship in the City of London. Finally, and perhaps more importantly, due to the Holocaust and other Jewish expulsions in other places

	around the world, it is the only surviving synagogue in the world to have maintained regular worship dating back to 1701. It is therefore of the highest significance locally, nationally and internationally. 2. Furthermore, the synagogue maintains a unique form of Jewish worship, that of the Spanish & Portuguese Jews. Many of its melodies, traditions and rituals are preserved only within this congregation, making its maintenance of great importance to the preservation of its unique intangible heritage which would otherwise be lost. **Officer Response: These comments are noted and are taken into account in the assessment set out below.** 3. The synagogue receives low levels of light, but just enough to maintain Jewish worship which requires sufficient light for young and old alike to be able to read hundreds of pages of prayers. However, it cannot absorb further reductions before the maintenance of this worship becomes untenable. The noticeable impact on light reduction from 1 Creechurch makes clear that this impact is real. The developer's admittance of reduction in our light levels affirms this reality. However, its dismissal of these reductions as minor or negligible is detached from the reality we face where further reductions are unacceptable as the cumulative impact of yet another reduction cannot be further tolerated. When light levels are poor, each further reduction, even amounts that in other contexts would be considered minor, in this context will be perceptible and several damaging. Without doubt then, with respect to internal light levels, the proposed tower would cause substantial harm, by risking the viability of use of Bevis Marks Synagogue for its original purpose, as a place of Jewish worship.

	Officer Response: Comments noted. The impact of the development on the internal light levels of the Synagogue is assessed in the Daylight, Sunlight and Overshadowing section of this report. This takes into consideration impacts of the consented and non-consented schemes. 4. As reported during the last application by Dr Joseph Spitzer, president of the Initiation Society which oversees Jewish ritual circumcision in the UK, any further reduction in light levels will make it impossible to continue to safely carry out ritual circumcision, a core marker of Jewish identity. The existence of multiple historic circumcision chairs in the collection of Bevis Marks Synagogue testifies to the long history of this ritual being performed at Bevis Marks Synagogue, as it continues to be maintained at the synagogue even until today. Rendering the performance of this important Jewish marker impossible at Bevis Marks Synagogue would surely be a substantial harm. **Officer Response: The above matter is assessed in the Daylight, Sunlight and Overshadowing, Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** 5. The location of the proposed tower along the southern horizon, adds to the substantial harm it would cause to the use of Bevis Marks Synagogue as a synagogue and to our worshipping community. Each month, Jews gather outside after dark to recite kiddush levana, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer. This is a direct obstruction to our freedom of worship as we have enjoyed it in this place since 1701.

	Officer Response: The impacts of the development on the visibility of the night sky and moon are assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. 6. The courtyard is also an important part of the community space, as a location where we celebrate festivals (such as Succot), hold receptions (for weddings and after services) and conduct events (such as BBQs and socials for City workers). The overshadowing of this space would significantly harm the amenity use of this space, particularly during the Spring/Summer months when it is more often utilised. **Officer Response: Comments noted. The impact of the development on the courtyard of the Synagogue is assessed in the Daylight, Sunlight and Overshadowing section of this report. This takes into consideration impacts of the consented and non-consented schemes.** 7. The courtyard is also an essential part of the visitor experience of our new visitor centre. It is where visitors will first enter, purchase admission, begin their audio guide, study a bronze map of the site and surrounding area, and study the exterior of the synagogue. The courtyard is a destination in its own right, not just a passage to the synagogue. The courtyard will also be used as part of our cafe. A decrease in amenity of this space risks the viability of our new venture, which in turn places the future viability of the synagogue at risk. It is a shared human experience that people don't tend to enjoy spaces that are in the shadows. As such the proposed tower would make the space unwelcoming and unappealing to visitors and community members alike, removing its significance. This impact must be considered significant harm.

	Officer Response: Comments noted. The impact of the development on the light levels of the Synagogue's courtyard is assessed in the Daylight, Sunlight and Overshadowing section of this report. 8. Developers have admitted that the proposed tower would reduce light levels in the Beadle's House, but have discounted these harms due to their identification of the upper floors as bedrooms. However, on account of the bright light in these upper floors, they are utilised throughout the day as rooms for reading (with reading chairs), a key need for a rabbi as study is a religious requirement, and as a playroom for the rabbi's family. The Beadle's house is therefore used throughout the day and reductions in its remaining best light must be considered a significant harm to both a resident and to the heritage of this historic property. **Officer Response: The impact of the development on the light levels on the nearby residential properties including 2 Heneage Lane is assessed in the Daylight, Sunlight and Overshadowing section of this report.** 9. A near identical tower proposal for this site was rejected in 2021. The reason cited on that occasion was the harm it would cause to the synagogue's setting. This new submission is little changed in any way that reduces the harm it would cause to the above as it would continue to dominate and overshadow the synagogue site, detracting from the significance of the synagogue and its courtyard. **Officer Response: The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application The previous decision is considered later in this report. Assessment**

	of the impacts of the development on setting of the Synagogue are assessed in the Heritage section of this report and those related to overshadowing of the courtyard in the Daylight, Sunlight and Overshadowing section of this report. 10.Indeed, since then, the City of London established the Creechurch Conservation Area, further increasing the threshold for allowing harm to sites within the CA, most notably the Grade-1 listed Bevis Marks Synagogue. 11.Beyond this, the Conservation Area report identified as significant the townscapes down Heneage Lane and down Mitre St, both of which culminate in Bury House. The report noted the sense of coherence of these streets due to the similar scale of the buildings along them. A tower at 31 Bury St would destroy this historic character and is therefore completely out of step with the new Conservation Area. As such, it would cause significant harm to the Conservation Area as a whole. **Officer Response: The abovementioned matters are assessed in the Heritage section of this report.** 12.Most clearly, there is a provision in the current local plan that bars tall buildings in Conservation Areas, making it difficult to understand how this application moved beyond the pre-app stage of planning. Regardless, for this reason alone it should be refused out of hand. Furthermore, the possibility that this policy may be removed from the Local Plan 2040 has no bearing at this point, especially when considering that it is not without considerable controversy, which according the planning guidelines means it cannot be relied upon at this stage in the local plan process before adoption.

	Officer Response: The emerging plan is a material consideration. Paragraph 48 of the NPPF states that "Local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)." It is considered that at this stage (following Reg 19 public consultation and prior to examination in public) the emerging City Plan 2040 carries limited weight to the determination of this application. 13.Furthermore, that Local Plan states that while the eastern cluster is designated for tall buildings, not every site within it will be appropriate for tall buildings. If this isn't the case example for that I can't understand where it wouldn't be acceptable. **Officer Response: This matter is addressed in the Architecture, Urban Design and Public Realm section of the report.** 14.For the purpose of clarity, I wish to confirm the near-constant anticipated use of the synagogue site for religious, communal and tourist purposes. Some of this may not be self-evident due to the impact of covid and the launch of our NLHF supported redevelopment project which began in 2020 and continues. As a result, we've had to step back from much of our usual activity, in anticipation of a large increase in activity from

	pre-2020 numbers. This will include daily worship, both in the morning and midday, and on the Sabbath and Jewish festivals. Furthermore, we will regularly conduct evening events, and weekend weddings. Finally, our visitor centre will be opened Sunday-Friday, welcoming at least 25,000 visitors a year including thousands of local school-children. All of these activities will be harmed in different ways by the proposed tower. **Officer Response: Comments noted. The functions of the Synagogue have been considered throughout the report assessing the impact of the development on the Synagogue, its amenities and its functions, as a place of worship and visitor centre.** 15.It is unconscionable that at a moment when Bevis Marks Synagogue is about to embark on a new chapter of vitality in its storied history, that the City of London would approve a development that puts its very future at risk, and certainly places it in a more challenging situation. This would be far from celebrating the synagogue's heritage and ongoing contribution to the City of London. **Officer Response: Comments noted. Consideration of the impacts onto the Synagogue as a place of worship, heritage asset and as a visitor centre are considered in the main body of the report. The decision about the acceptability of the proposed development is yet to be made at the PASC committee.** 16.The synagogue as a whole should be seen as one of the best expressions of the 'Destination City' vision, and harm to it must be avoided. **Officer Response: Comment noted.**

	17.The generic public benefits offered by the developers do not in any way counteract the substantial and enduring harm their proposed tower would cause to the synagogue and its functioning as a living place of Judaism, one of the most unique synagogues in the world. Permission would further chip away at the ability of Bevis Marks Synagogue to function as a synagogue, placing it at existential risk of becoming yet another 'heritage asset'. Once the unbroken chain of worship is broken, it can never be repaired, and all that Bevis Marks Synagogue is and represents will be lost to history. **Officer Response: Comment noted. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less that substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.** 18.With further regard to the proposed benefits made by the applicant, making use of lower floors for charities does not justify the construction of a tower. These benefits could equally be offered even with a shorter building, just as they are currently being offered to charities with the current Holland House building. Furthermore, the charity space is in Holland House, which is adjacent to Bury House. Just because the developers own both properties, the use of Holland House does not constitute a public

	benefit to the Bury St application that should justify the substantial harm that Bury House would cause to the Bevis Marks Synagogue. In addition, the use of this space by non-local charities does not justify harm to a local community (Bevis Marks) who should be the primary concern of neighbouring developers, not sidestepped as this proposal tries to do. Finally, these benefits are not unique, and could equally be offered in any other scheme. Therefore they are not a justification to cause harm to the functioning and setting of the synagogue, a site that irreplaceable and altogether unique, and is of the highest level of significance. **Officer Response: It is noted that none of the current meanwhile uses are secured or controlled by condition or obligation for charity purposes and therefore, these charity uses can cease at any time. Furthermore, the local planning authority can only assess a development that is before them for determination. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less that substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.** In sum, this scheme is so ludicrously inappropriate that I can't believe developers have not withdrawn their application. If we were in a court,

	I'd ask the City to throw out the application as frivolous. Save that, I implore the Corporation to refuse this application and once and for all protect the integrity and future of Bevis Marks Synagogue.
Roger Hepher, on behalf of the S&P Sephardi Community (15 May 2024, 15 November 2024 and 28 November 2024)	**Officer comment: A summary of the letters is included below. Full versions of these letters are provided as part of the background papers.** The letter received on the 15th May is summarised below: The proposals will have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and an unacceptable impact upon other heritage assets in the vicinity. A previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. Put simply, the revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the applications should be refused. **Officer Response: The position of the S&P Sephardi Community is noted and is taken into consideration in the assessment set out below. The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application. The previous decision is considered later in this report.** - Bevis Marks Synagogue is a significant building, with outstanding communal, architectural, artistic, historic and archaeological significance. It has been continuously in use for worship since its construction. - The Synagogue's courtyard is of value due to it use as a social and religious space, for gathering before and after services and for holding events. - The sky view at Bevis Marks is central to a number of rituals. The Jewish Sabbath concludes at the appearance of three stars which first appear in the

	darkening eastern sky. The beginning of each new Jewish (lunar) month is marked by the appearance of the new moon, at which time a special prayer (kiddush lebana) is recited. - There is spiritual significance of natural daylight within the Synagogue. The Synagogue has already experienced a substantial reduction in natural light as a result of the construction of other buildings. Further deterioration of the natural light will have profound implications for the religious value of the Synagogue as a spiritual space and house of Jewish prayer. **Officer Response: Comments noted and are addressed in the Heritage, Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** - A Heritage Assessment of the proposed development has been prepared by Alec Forshaw on behalf of the objectors identifying substantial harm to the Bevis Marks Synagogue and the Creechurch Conservation Area. Less than substantial harm has been identified in several other heritage assets. - It is also stated that the proposed repairs and renovations to Holland House should be regarded as routine and not a benefit. - The proposed reinstatement of Heneage Lane is at a different angle from the original lane and it would be gated and closed at night. - The proposed reinstatement of St James Court significantly reduces the size of the existing open courtyard **Officer Response: The impact of the proposed development heritage assets is assessed in the Heritage section of the report.** - The fact that the Synagogue is already going to experience loss of daylight is not an argument in favour of the Applicant; rather, it demonstrates the need to protect the precious remaining daylight and for the current proposals to come under even greater scrutiny. - No account is taken of the fact that the Synagogue is illuminated primarily by natural light and by

	candles, or that the reading of printed scripts is fundamental to worship. - The loss of nearly a fifth of the sunlight within the courtyard cannot rationally be considered to be of little consequence in the context of an already very low level of sunlight. - No consideration is given to the fact that the synagogue is a centre of a thriving community and the courtyard is used fir several religious events and to view the heritage asset. **Officer Response: The abovementioned comments are assessed in the Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** - At Bevis Marks, the view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue, and is a most important aspect of the heritage value of the building. **Officer Response: Comments noted and are addressed in the Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** - The Equality Statement is inadequate in assessing the proposed impacts of the development on the operation of the Synagogue. - Not only does the Equality Statement demonstrate a lack of understanding of the impact of the proposals on the Synagogue. It implies that the impact of the proposals on the Synagogue is outweighed by other factors such as the increased provision of commercial floorspace. **Officer Response: The City, as a public authority, in exercise of its functions, has given due regard to the need to: a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act; b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it; and c) Foster good relations between persons who share a relevant protected characteristic and persons**

	who do not share it. The abovementioned matters are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. - The operational jobs are capable of being achieved on many other, less sensitive, sites. - There is no convincing evidence that the existing building is incapable of re-use. - There are many other less sensitive sites where a high quality tall building could be delivered. This urban block, which is part of a Conservation Area, does not need "transformative reimagination" - The community workspace is a potential public benefit, though it is unclear whether it would meet a specific need. It could also be delivered on another, less sensitive site. - The community, multi-faith, cultural and education offer is a public benefit that can be delivered elsewhere. - There is no shortage of flexible retail space in the City. - There is no need for public realm enhancement within what is a Conservation Area. - A sensitive re-use of the existing buildings could achieve a substantial increase in BNG. - The package of public benefits proposed by the applicants are typical benefits which any major commercial scheme would be expected to deliver. **Officer Response: The proposed uses and public benefits of the proposed development are discussed through the report and in the in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.** <u>The letter received on the 15th November included the following additional information:</u> - A daylight/sunlight study. The assessment of the lighting levels was carried out between 26th February 2022 to 2nd April 2024 using two illuminance meters. - Responses to the letter prepared by the Applicant's agents DP9 dated 27th September 2024, specifically in relation to the GIA Lunar Transit Study; - A letter from Professor Barry Stiefel, Professor of Historic Preservation & Community Planning at the

	College of Charleston, regarding the significance of the sky view for Bevis Marks Synagogue; and - The findings of a review of the applicant's Equalities Statement prepared by the barrister Claire Nevin. Generally the position remains that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. **Officer Response: The position of the S&P Sephardi Community is noted and is taken into consideration in the assessment set out below.** The objector considers that the applications should be refused for the following reasons: 1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and empirical evidence of poor daylighting. **Officer Response: Officers address the abovementioned matters primarily in the Heritage, Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** 2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

	Officer Response: Officers respond to matter in the Heritage sections of the report. **On both abovementioned points the heritage harm against the public benefits are assessed the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.** 3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused. **Officer Response: Officers respond to matter in the Heritage sections of the report.** 4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration. **Officer Response: This matter is addressed in the Heritage sections of the report.** 5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use. **Officer Response: The proposed uses and public benefits of the proposed development are discussed through the report and in the in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.** 6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis

	that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits. **Officer Response: The Applicant has confirmed that they are not putting forward an enabling development argument and the local planning authority has not assessed the proposed development as such. The proposed development involves three building, of which one is a listed building. Any heritage harm identified that is less that substantial is assessed against the public benefits of the development. These are discussed in several sections of the report, including the proposed uses, section, the heritage section and the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. Spatially, these benefits are delivered in all three buildings of the proposed development. Furthermore, the local planning authority can only assess a development that is before them for determination.** 7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it). **Officer Response: A viability assessment has not been requested to accompany the application, as this is not a policy requirement for this type of development. It is considered reasonable to assume though that the proposed development has been tested commercially for its viability by the Applicant. Without any evidence being provided by the objector, the local planning authority cannot come into conclusion based on assumptions.**

	The objector concludes that the additional information produced by the applicant or their agent in response to our previous objection do not change their position as set out before. The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence, and because the significance of the sky view is now better understood. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it, let alone to justify a clear conflict with City Plan Policy CS14. **Officer Response: The comments are noted and is taken into consideration in the assessment set out below. The previously refused application has been taken into consideration for the assessment of the current application. Matters in relation to the level of harm of the proposed development on the identified heritage assets is assessed in the heritage section of the report. The impact of the development on the visibility of the sky and the moon are assessed in Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** <u>The letter received on the 28th November included the following additional information:</u> - An assessment of the impact on the Synagogue of the proposed development in Heritage/Townscape terms, prepared by Donald Insall Associates (Appendix 1); and - A paper by Rabbi Shalom Morris providing further contextual detail on Bevis Marks Synagogue and its setting (Appendix 2). Heritage/Townscape Impact Assessment Donald Insall Associates has been instructed by The S&P Sephardi Community to prepare a professional third party assessment of the heritage impacts of the proposals, particularly the impact of the proposed development on the significance of Bevis Marks Synagogue. The report finds that, in summary, the proposals for the Bury

	Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue. Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as *'the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting*'. This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well assist courtyard setting which frames the building and allows community and religious activities to take place. The report concludes that the proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting. **Officer response: The matters raised above are addressed mainly in the Heritage and Strategic Views, but also in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** Setting Study Rabbi Shalom Morris has prepared a study of the setting of Bevis Marks Synagogue, with reference to its specific

	cultural and religious context and Jewish sources. The report draws on sources including Jewish religious law and the communal records kept at the Metropolitan Archives, alongside discussion of the community over time and how it operates today. Reflecting on these sources, the report explains the wide-ranging harm that the proposed tower would cause to the significance of the Synagogue, in terms of harm to: • The original architectural intent of the Synagogue's design; • Religiously important sky views; • Interior light levels necessary for prayer; • The purposeful functioning of the architecturally significant windows; • The amenity of the communally important courtyard; • The meaning of the Synagogue's name; and • The economic viability of the site. **Officer response: The matters raised above are addressed in the Heritage and Strategic Views, Daylight, Sunlight and Overshadowing and in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** **Normally matters such as the financial impact on a neighbouring business or property values are considered to be private matters and not material planning considerations. Even if the view was taken here that income generation was relevant because of the listed status of the building, there is no evidence to suggest that the development is likely to impact on the number of visitors the synagogue will receive or the number of weddings held, and this would be difficult to quantify with any accuracy through a viability review.** The documents enclosed further support our client's position that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.
Board of deputies of British Jews	I am writing to you, as I was forced to write to your predecessor in 2021, to object formally to this

	planning application which, if approved, would have a detrimental impact on the Jewish community's beloved Bevis Marks synagogue, the oldest continuously used synagogue in Britain which dates from 1701. This most recent planning application is no less harmful than the earlier one which thankfully was rejected, following widespread opposition. I write as President of the Board of Deputies of British Jews aware that my organisation, founded in 1760 to represent the Jewish community throughout the country, emerged from those Jews of Spanish and Portuguese heritage such as the founders of the Bevis Marks Synagogue. Modern British Jewish history was born at Bevis Marks when Jews first returned to this country following our expulsion in the 13th Century. It offered a safe haven to those who came from overseas and that feeling very much remains to this day. The synagogue is also the legacy of those who came before me in leading the community, and whenever I am at Bevis Marks I am humbled by that fact. At 45 storeys, the proposed building would destroy the southern sky view, which is an essential part of the setting of the synagogue and is important for the intangible qualities it contributes to our religious ritual. Not only will it shroud the building in shadow, but it will have a direct impact on the local communities weekly Sabbath rituals. In Judaism, it is essential that we judge the coming of the Sabbath, and the end of the Sabbath, by our view of the night sky and the visibility of the stars. Should this development go ahead, the view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. Lastly, the synagogue, which is a Grade 1 Listed building will lose its character and significant beauty as a result of the proposed development. To add further insult to injury, the area has recently become the Creechurch Conservation Area, and this proposal flies directly in the face of the principles of conservation. I would urge you to

	share with those who will make the relevant decisions, how important the Bevis Marks Synagogue is both to the UK Jewish community, to the City of London, and to the UK as a whole so they can come to the best decision regarding our shared heritage and reject this application. **Officer Response: Comments noted. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.**
Foundation for Jewish Heritage	I am writing to register the Foundation for Jewish Heritage's strong objection to the above application. Our objection relates to the negative impact that the proposed development would have on the Grade I listed Bevis Marks Synagogue (NHLE List Entry Number: 1064745). Bevis Marks is the oldest surviving synagogue in the UK and is arguably the most important Jewish heritage site in the country. The Synagogue is of exceptional significance both to the UK's Jewish community and in the history of the City of London, in which Sephardic Jews played a pivotal role. In respect of the previous application, our trustee Esther Robinson Wild wrote a comprehensive objection dated 01.02.21. All of the points made in this document apply to the new application. In addition, we would like to make the following

	points in support of our objection to the new application: 1. The alterations made to the proposal since the previous application do not address the grounds on which it was refused, including the unacceptable impact on the Synagogue. We welcomed the planning committee's refusal of the previous application and can see no reason for this decision to be undone by the new application. Indeed, the subsequent creation of the Creechurch Conservation Area and the widening of the new proposal's footprint strengthen the case for refusal. 2. The Foundation's previous objection stated that we expected a robust and thorough assessment of the significance of a Grade I listed heritage asset which may be impacted by a major development of this nature and that we were concerned by the absence of such. We remain concerned that no such assessment has been adequately carried out. The Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment submitted with this application includes a single page heritage assessment devoted specifically to Bevis Marks Synagogue (sections 8.124-8.139). It includes no attempt to assess the evidential or communal significance of the site, points raised in our previous objection. The assessment is incomplete and inadequate for a Grade I listed site of outstanding historical interest. We again call for a thorough Statement of Significance for Bevis Marks Synagogue to be prepared along with a robust assessment of potential harms to significance caused by the proposed development. 3. We fundamentally disagree with the assumption of the heritage assessment that the setting of Bevis Marks Synagogue makes no contribution to its significance, and that therefore the proposed development would result in 'no harm' to significance. We fully support Historic England's position that the setting does in fact contribute to

	the significance of the Synagogue. We believe that the proposed development will cause substantial harm to the setting of Bevis Marks Synagogue. 4. The proposed development sits within the Creechurch Conservation Area, which was created in part to achieve 'Fuller recognition of the Jewish history of the locality' (Creechurch Conservation Area Proposal, City of London Corporation, December 2023). The application must be determined in accordance with the City of London Local Plan 2015. Core Strategic Policy CS14: Tall Buildings clearly states that the City will refuse planning permission for tall buildings in conservation areas. The proposed development would contravene both CS14 and DM12.2 which states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. 5. The proposed development would mean that the Synagogue's courtyard would be overlooked to an unacceptable extent. The visualisation of the view from the courtyard submitted with the proposal (Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment, View 45a proposed, pp211-212) shows how there would be views into the courtyard from the majority of floors of the proposed Bury House. The Synagogue courtyard was designed as a secluded, peaceful and private space for spiritual practice. and has been used in this way for three centuries. The overlooking of the courtyard would represent a very substantial change to the privacy and intended atmosphere of the space. While we agree with the Environmental Statement that the change to the view from and into the courtyard will be 'large', we strongly disagree with the assessment of the view as being of only 'medium' sensitivity, and find it difficult to understand the conclusion that the effect would be 'moderate' and 'beneficial'. 6. The Foundation for Jewish Heritage is concerned with the conservation of Jewish built heritage. It is not a religious organisation; therefore we defer to

	the congregation of Bevis Marks Synagogue in assessing the impact of the proposal on their religious practice. We fully support the congregation's position that the proposed development would have a serious, negative impact on their ability to carry out religious rituals. We hope that the reasons for our objection will considered in your determination and would welcome the opportunity to provide further comments if needed. **Officer Response: Comments noted. The amendments from the previously refused application are discussed in the proposal section of the report. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of loss of privacy, officers do not consider that there would be any more risk and loss of privacy than the existing situation as there are already a number of tall buildings, which are in close proximity to the Synagogue.**
Office of the Chief Rabbi	As you will know, Bevis Marks is the oldest synagogue in the UK in continuous use, and a deeply resonant symbol of the history of British Jewry. In the 320 years since the Bevis Marks Synagogue was built, the Jewish community has become a valued part of the fabric of British society. Bevis Marks was one of the first major synagogues to be constructed following the resettlement of Jews in England in 1656. It has stood as a reminder of that history, and of how much has been achieved since members of the Jewish faith were permitted to return to this country.

	I have been troubled to read that there is now another proposed development on the doorstep of the synagogue, with very limited changes to the original proposal, with the potential to significantly affect the natural light that can reach the building. This will, in turn, disrupt prayers taking place inside, and the use of the courtyard outside. It would have a notable impact on the atmosphere that Bevis Marks is so famed for around the Jewish world, to the detriment of those worshipping there. Beyond this, by further reducing views of the southern exposure sky, this proposal would have implications for worshippers at Bevis Marks wishing to recite the monthly prayer kiddush levanah, recited after nightfall upon seeing the waxing moon in the sky. The granting of permission to this proposal would therefore be a regrettable development with implications for rights of religious practice, precisely in the place where Jews first enjoyed these rights in England following the 17th century resettlement. That would be a tragic irony. It was my hope that the City's new Creechurch Conservation Area would serve to protect Bevis Marks Synagogue from this type of scenario. I am disappointed that this seems now not to be the case. I trust that this can be rectified with some adjustments in the new local plan, ensuring that the synagogue's southern exposure remains unobstructed. Thank you for your consideration of this matter. **Officer Response: Comments noted. The amendments from the previously refused application are discussed in the proposal section of the report. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act**

	2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.
Senior Rabbi Joseph Dwek of The S&P Sephardi Community	You will no doubt be aware of the strength of feeling around this submission, and I share in that deep disappointment. As the Senior Rabbi of the S&P Sephardi community, the custodian of Bevis Marks Synagogue, I am aware of the severe distress this application has caused, the waste of community resources it has engendered, and of the complete disregard it has shown for the needs of the Jewish community. I've already submitted a detailed account appended to the synagogue's formal objection outlining the diminution of our religious practices that would result should this application be approved. Please see there for more information. But in short, the proposed tower would block out views of the southern sky necessary for Jewish worship, in particular the necessary views of the moon in the night sky for the Kiddush Levana prayer. Jewish tradition also strongly prefers that synagogue worship more generally include sky views, and clearly this was intended in the original design of the Bevis Marks synagogue with it numerous windows. This would no longer be possible should the tower at 31 Bury St be permitted. Finally, the further reduction in sunlight falling on the entirety of the synagogue site that would result from such a tower, would also harm the community's ability to worship as it has for over three centuries. This is both a breach of our religious rights, but it is also in conflict with the original design of the building, intended to be usable by daylight, which was an

	intentional departure from medieval buildings or houses of worship with stained glass windows. More fundamentally, it is shameful that our community is forced to campaign once again to protect Bevis Marks Synagogue, when it should already be abundantly clear that it is in need of protection from circumstances such as this. That the City of London has as of yet refrained from formulating policies that would prevent this harm from even being proposed is a dereliction in their duty of care, and it demonstrates a disdain and disregard for the well-being of the UK's oldest Jewish community. At a time of increasing Antisemitism in this country, I expect more from the City. I call upon the City to refuse this proposal without caveat and ensure the long-term protection of Bevis Marks Synagogue. **Officer Response: Comments noted. The daylight impacts of the proposed development on the Bevis Marks Synagogue as a place of worship are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.** **In relation to the formation of the City of London Planning Policies, it is noted that these are being prepared and assessed for their soundness under a separate process to that of the planning application process. It is therefore not considered pertinent that officers respond to matters relating that process as part of this assessment of this planning application.**

	Although the impact that an application might have to a community is understood, it should be also noted that the local planning authority cannot stop an applicant for submitting an application for consideration.
Rabbi Dr Michael Hilton	Thank you for writing to me to seek my views on the above planning application. Reason for writing: the proposed building of 43 above ground storeys will overwhelm the nearby Bevis Marks Synagogue which is the oldest synagogue in Europe in continuous use. I have attended for worship on an occasional basis for the past forty years. The synagogue received a grant of nearly £2.8 million from the National Heritage Lottery Fund for restoration work and the conservation of collections. Work is now almost complete, and will include a museum and heritage exhibition, whilst the synagogue will continue to serve the community through prayer services. Astonishingly, daily worship by the Minister (on his own) was able to continue right through the Covid lockdowns, and the synagogue has remained open during the subsequent building works there. It seems perverse, to say the least, to spend public money on conserving the synagogue and at the same time to destroy its wider setting with a tower block directly to the south 43 storeys high. Reductions in light, described by the developers as 'negligible', will none the less impact the reading capacity of older users of the synagogue with poor eyesight, of whom there are many. In addition, construction of the four basement levels threaten the stability of the synagogue building, since it is 323 years old and like all buildings from that period, has shallow foundations. The published heritage plans for the City state that the surroundings of Bevis Marks Synagogue should not just be preserved, but enhanced. In contrast to this, the enhancements and green features

	described by the developer will have no impact on the Synagogue at all. The envisaged City Plan 2040 has a whole section (S11) on "Heritage and Tall Buildings." It begins with the words: Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets; Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness Please note also the following four specific references to the synagogue: 11.1.1 There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17th century home on Cloth Fair, the unique early 18th century Bevis Marks Synagogue, and Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects. On tall buildings: 11.1.7 Applicants will be required to undertake a comprehensive heritage assessment proportionate to the scale of their site and heritage asset to understand ways in which their proposal could contribute towards the enhancement and enjoyment of the historic environment. 11.2.1 The City Corporation has identified "immediate setting" areas around The Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance.

	Policy HE1 6 Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered. Policy HE1 8 Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets. 14.6 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. Three of the paragraphs quoted above mention the 'immediate setting' of the Synagogue. A Policy Paper (Policy Paper: Bevis Marks Synagogue - Immediate Setting January 2024) explains that the 'immediate setting' means only the buildings adjacent to the synagogue, not those in the wider area, however close by they may be. The paper contains valuable information on the architectural history and significance of the synagogue, which should be drawn to the attention of the Planning Committee. However, the Policy Paper does also comment on the Synagogue's wider setting and argues that this too must be carefully managed: the introduction of tall buildings, which is a relatively recent development in the context of the history of the building, has changed the character of the setting above the courtyard by introducing built form and activity into an area that was previously sky space. This has altered the sense of

	seclusion that is an important element of the significance of the synagogue, both functionally and symbolically. Additionally, there are recently consented schemes for other tall buildings, some of which are currently being implemented... further development that has the potential to reduce the sense of seclusion offered by the Immediate Setting of the courtyard framing the Synagogue has to be carefully managed. Although not technically part of the 'immediate setting' of the synagogue, the Proposed Development is so overwhelmingly tall and close to the Synagogue that in reality it will affect the immediate setting far more than the existing tall buildings visible from the courtyard. The heritage implications are profound. Please see below for my remarks on the importance of daylight and a view of the sky for traditional Jewish worship. The synagogue was designed by a pupil of Sir Christopher Wren and deserves as much environmental protection as the City's Wren Churches, to which it is comparable in scale and standard. In my travels round Europe I have visited many historic synagogues and seen none hemmed in and overshadowed by such a close and tall building as is here proposed. If they accept this proposal, the planning committee would be ignoring the City's stated objective and current and past practice of seeking to preserve and to enhance the setting of heritage assets. Aldgate Square, a few metres away, enhances the setting of St Botolph's Aldgate and by providing leisure space, ensures that people stop to admire the Church. On the other side of the synagogue, the setting of St Helen's Bishopsgate has also been enhanced by new open space at the Gherkin Plaza. Contrast the synagogue, which will be hemmed in as if the City were ashamed of it. I invite members of the Planning Committee to consider how the development will enhance the setting of the synagogue as their policies

	require. In view of the importance of heritage in the centre of one of the world's oldest cities, and the huge importance of tourism to the city, questions need to be asked about how these considerations are considered by the Planning Committee and in particular whether there is specific heritage representation on or to the group. Environmental Impact References below are to paragraph numbers in the 'Environmental Impact Statement' by Trium. The new documents submitted on behalf of the developers repeat the erroneous argument previously used that because the setting and the light levels in and around the synagogue have been compromised in the past, it is somehow acceptable to compromise them still further. None of the documents submitted discuss the right of the congregation to enjoy freedom of worship in the way they and their predecessors have done at the synagogue for the past 320 years. Of the three daily Jewish prayer services, two of them, the morning and afternoon prayers, have to take place during daylight. This does not simply mean during daylight hours but in a setting which has natural light. This idea goes back to the Bible, where it is written (Daniel 6:10) "Daniel went into his house with the windows open in the upper chamber facing Jerusalem, and three times a day he kneeled upon his knees and prayed and gave thanks before his God." The medieval commentator Rashi explains that through windows we can see the sky, and remind ourselves of our submission to heaven (comment on the Babylonian Talmud Berakhot 34b). From this you can see the importance of not shutting out or inhibiting the view of the sky from a synagogue. It also explains why the architect of Bevis Marks synagogue placed the windows high up, so that eyes could be raised heavenward during prayer. The beauty and purpose of this design will be frustrated and damaged by a view up towards new tall

	buildings. You cannot measure the value of the setting of a heritage asset with a light meter. None of the statements on behalf of the developers address this point. The Environmental Impact Statement submitted by the developers has 251 pages and contains over a hundred references to Bevis Marks Synagogue. In spite of the length of the report, there is no mention at all of the view of the new building from the synagogue courtyard. This is a serious omission. Furthermore, the Environmental Impact Statement was submitted before the Creechurch Conservation Area was established and therefore does not include any reference to the additional protection which one might expect this to provide to Bevis Marks Synagogue, to Holland House, and to the many other listed buildings nearby. The Statement details various meetings and similar application was refused in 2020 and details that a previous and very proposals which have taken place to ensure that the new application does not carry as much environmental impact. Unfortunately, the slight reduction in height and the slimmer top of the building will make little difference to Bevis Marks Synagogue. The report notes (9:100) that there will be a vibration impact on the synagogue during construction from pile driving, and that this will be increased when the auger hits the base of the hole. However, there appears to be nothing that describes the additional affect that vibrations will have on a building more than 300 years old. This is a serious omission from the assessment, especially considering the depth of the four basement levels. Vibrations spread and so the effect of pile driving at a greater depth can be felt further away. A well written report should give examples of vibrations from different levels, so that calculations can be made as to how many basement levels, if any, should be permitted in

	order to ensure that the synagogue's foundations are not damaged. On the question of sunlight, the report claims that the Synagogue courtyard currently receives less than 2 hours of direct sunlight on March 21st and September 21st each year. However, there appears to be no mention of indirect sunlight reflected from neighbouring buildings. I have noticed myself how much the light level in the synagogue changes suddenly and markedly on a day when there are many clouds coming across the sun, as the light is reflected off the building across the courtyard into the large upper windows at the west end of the synagogue. Indeed, this dappled sunlight, coming and going through the windows and illuminating the dark wood throughout the synagogue creates a very beautiful effect. It is therefore alarming to read an impact assessment which does not even consider this. On the question of daylight, the report makes the same error as the 2020 report, arguing that because the amount of daylight is already very low, the effect of reducing it further will be high in percentage terms, but negligible in real terms. This is tantamount to saying that because the synagogue is already too dark, it is acceptable to deprive it of even more light. The argument places the legal technicalities above what happens in real life. If I am struggling to read my prayer book on a dark day in the synagogue, even the tiniest further reduction is going to affect my reading adversely. When the light is already below par, there is no such thing as a negligible further reduction. The whole argument is a false one. The fact that the report repeats this same argument many times does nothing to enhance its case. Furthermore, it is a known fact that eye problems increase, and eyesight diminishes, with age. The reduction in daylight woefully described as 'negligible' will therefore have a disproportionate impact on older members of the congregation, of

	whom there are many. This constitutes discrimination on the basis of age, which is illegal under the terms of the Equality Act 2010. It is not sufficient for the developers merely to consider an 'average person' when assessing the light impact on a building with a high proportion of older users. Furthermore, the higher reduction in light at upper levels is discriminatory against women users of the synagogue; the effect on those with reduced eyesight is discriminatory against less able users; and the whole project disadvantages the Jewish community which has no other synagogue within the City of London. Similarly, the question of overshadowing is dismissed on the grounds that the Synagogue courtyard is already in shadow, and therefore only a very minimal portion of the Proposed Development shadow hits the ground (10:174) at any time of the year. This ignores the fact that shadows make a difference above ground level as well, and will reduce the amount of light coming through the upper windows, especially those at the western end and the south west corner which currently provide a considerable proportion of the Synagogue's light. Paragraph 15:9 of the report states that during demolition and construction, the Proposed Development will have significant adverse effects on the Synagogue as a result of the use of heavy machinery and tall cranes and the erection of other infrastructure needed for construction, such as scaffolding, hoarding, mobile cranes, site lighting, temporary site offices and facilities. The section of the report on mitigation does not mention the Synagogue, and there is no assessment at all of whether or not this could cause irreparable damage to such an old and fragile building. Summary The Proposed Development application does not take sufficient account of the City's existing and anticipated heritage policies, nor does it take

	account of Conservation Area policies which require any new development to enhance the setting of the synagogue. The Proposed Development discriminates against older people and other protected groups by dismissing as irrelevant small reductions in the light in a building used for the reading of books. The new building will have a negative visual and overshadowing impact on the synagogue and its setting and context within the City townscape. Pile driving during construction may cause damaging vibrations. I am against this planning application. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.** **Matters relevant to equality impacts of the development are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. It is also noted that the applicant has submitted an Equality Statement which has been third party reviewed. Overall, the third party reviewer considers that the scope, methodology and findings of the EqS, and the mitigation and enhancement measures to mitigate the potential impacts, are appropriate to the potential impacts on protected characteristics arising from the Proposed Development.**

	The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. **Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.**
Reverend Laura Jorgenson of St Boltoph without Aldgate	Objection to planning application 24/00021/FULEIA (Bury House 1-4, 31-34 Bury Street) and 24/00011/LBC (Holland House 1-4, 32 Bury Street). I write on behalf of the St Botolph without Aldgate PCC to object to the above planning application. Bevis Marks, the only dedicated non-Christian place of worship in the City of London, has been a centre of worship and community for three hundred years. It is more than a 'heritage asset'; it has a beating heart of people, many of whose families have worshipped there for generations, some since the synagogue has been built. In recent years the synagogue has been fighting for its very survival. Building a tower which will cast the Synagogue and its courtyard into shadow, taking away the view of the sky is not merely a matter of light, but also of ritual - of their ability to worship in the building, and of particular importance to the congregation are the prayers at the appearance of the new moon, which they will no longer be able to do if this development goes ahead. As a neighbouring friend and colleague St Botolph's is keen to support and encourage the congregation

	at Bevis Marks in their life as a vibrant community, with a future, including their new Education Centre which will bring thousands of school children to the City. We have deep concerns that should this development go ahead, instead of a living community, Bevis Marks will ultimately instead a place of remembrance of the historic Jewish communities in the City. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.** **The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.**
Reverend Dr Malcolm Torry, St Mary Abchurch	I am writing to object to the proposed new building and extensions of buildings that are the subject of planning application no. 24/00021/FULEIA and listed building consent 24/00011/LBC. On the 18th of April, Rabbi Morris of the Bevis Marks Synagogue was invited to attend the City Deanery Clergy Chapter to tell us about the planning application for a 44 storey office block just a few metres from the synagogue. He explained that a very similar application had previously been rejected by the Planning Committee; that a Conservation Area had been

	proposed, but that the site of Bury House had been omitted from it; and that when that site was then included in the Conservation Area (which unusually still seems to permit new tall buildings) the new City Plan document relating to the Bevis Marks Synagogue's 'immediate setting' (document ED-HTB29) did not include the site of Bury House, which is where the 44 storey block would be built: a tall building that would substantially impact the synagogue and so should surely be included in the immediate setting-which would in turn suggest that the planning application should be rejected. I notice that the buildings adjacent to Bury House have also been omitted from the 'immediate setting', yet the planning application proposes adding additional floors to these, which would also substantially impact the synagogue, suggesting that these buildings too should be included in the immediate setting-which would again suggest that the planning application should be rejected. Reverend Dr Malcolm Torry This morning I visited the synagogue and explored the surrounding streets. It was immediately clear to me that to locate a 44 storey building on the site of Bury House, and to add additional floors to adjacent buildings, would, in the context of existing tall buildings, completely hem in the synagogue and remove most of its natural light. This unique synagogue, a Grade I building that has been in constant use by the Jewish community for over three hundred years, and that unusually for a historic City building has its original interior intact, would experience significant harm, as would the community that uses it. I understood from Rabbi Morris that the developer has offered space for community use in the buildings that it now owns. What it might have failed to realise is that temporary community benefit can never substitute for permanent community and heritage harm, which is what it is planning to inflict on London's Jewish community and on its synagogue: an unconscionable thing to do,

	particularly at such a complex and difficult time for London's Jewish community. Please, for the sake of the City's heritage, and for the sake of its Jewish community, reject this planning application; forbid the building of new tall buildings in conservation areas; and do all you can to protect the precious heritage that the City of London Corporation holds in trust for London and its people. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** **The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.** **The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less that substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. It is noted that the proposed community/cultural/education offer and the proposed affordable workspace would be secured by the S106 agreement for the lifetime of the development.** **The comments which call into question the professionalism and integrity of the Corporation's officers are unsubstantiated and strongly refuted. It is noted**

	that any investigation relating into an accusation that there was an undue influence of developers on the City Corporation regarding the designation of the Conservation Area, would be a process that is carried out by a separate department of the Corporation in accordance with the relevant protocol. Having sought advice from the Comptroller and City Solicitor's Department it is clear that an investigation of this nature would only be carried out if there was evidence to support such a claim. It is not considered that this separate process would constitute a material planning consideration that would influence the assessment or decision making in respect of the current application.
Reverand Josh Harris, St Katherine Cree	As a local church leader, I object to this proposal because it involves direct and specific harms to the local Jewish community specifically, including restricting their freedom of worship by obscuring a key portion of the sky and reducing natural light levels to unsustainably low levels. I am proud to minister in the City of London, which we regard as an open, tolerant, civil place which hosts a diverse and international community. I am concerned that this development, if approved, will seriously undermine that reputation, at a moment when we should be particularly working to ensure the safety of the Jewish community. As Priest-in-Charge of St Katharine Cree, I am closely engaged with the local community in and around Bury Street including workers, residents, and those who access community services in our church. We have undertaken more than 1,000 face to face conversations with City workers in the last three years.

	In my view, the proposed community benefit of this development and the investment in Holland House is intangible and, on the basis of what has happened in similar developments, unlikely to be sustainable to operate - and seems to have required importing organisations with the offer of free space to give the impression of deep community engagement. There are few successful examples of this kind of space I know without an 'anchor institution' running them such as a church, major established charity like Toynbee Hall, or local authority. As someone with expertise in the local community's needs, I cannot see significant likely benefit from the plans to the workers and residents who we engage with in the existing local community. Our community was proud that the City has recently created a conservation area here, and we were looking forward to working with the City to celebrate this and to see how we can together enhance it. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.** **The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less that substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.**

	The impact of the proposed development on the Creechurch Conservation Area are assessed in the Heritage section of the report.
The Honorable Company of Master Mariners	Representation on 24/00021/FULEIA 1.1 Its background and purpose outlined above compel the HCMM to register an objection to this planning application centred on No. 31 Bury Street EC3. In this, it wishes to remind the City of London Corporation that on 7th April 2021, it objected similarly to the original application for this site, 20/00848/FULEIA. The HCMM did so not only in defence of the Bevis Marks Synagogue, the most directly impacted, but also the other heritage assets that would be affected by the development, not least those of Trinity Square and the Tower of London World Heritage Site with which it has particular association. These were also the key reasons given by members of the Corporation's Planning and Transportation Committee in refusing the original application at its meeting on 5th October 2021. Moreover, the HCMM later voted with the majority in delineating the conservation area around the Synagogue that now appears to have been ignored by the Corporation. As a City livery company, the HCMM cannot take lightly the need to respond in this situation. 1.2 'Skyscraper' is a term little recognized now as of maritime origin. In the days of square-rigged ships such as tea clippers racing to be first back in London in the 1850s and 1860s, every breath of wind was sought when becalmed. Extra sails would be added up the masts, the seventh and last being the skyscraper. Irony is thus added in this present context, but the HCMM again cites the City's maritime past and present in support of its objection to this revised application which offers only the most marginal modification. 1.3 In 2022, the Corporation launched Destination City, currently promoted as 'The City is the birthplace of London with a unique and diverse offer'. In fact, from the sea and Thames came the

	maritime trade out of which the City and so much more grew. Destination City will celebrate, promote, and support the Square Mile's unrivalled history and heritage. It is hoped that the embedded pages here, outlining a little of that 'unrivalled history and heritage', may illustrate the difficulty of attempting to reconcile the Corporation's apparent valuing of heritage with its contradiction as embodied in this application. 1.4 The estate agents' mantra, it is said, is 'Location, location, location', but the more appropriate term is 'context'. Without expertise in the fields of architecture and construction, the HCMM is content to defer to the conservation bodies and specialists. Instead, it is in particular regard to the wider significance and context of the application that it is opposed by the HCMM. 1.5 London, especially the City, is built on maritime trade with much of Britain's maritime past and present to be seen in EC3 alone. The maritime sector remains a significant business presence in the City while the City's worldwide standing as a banking, finance and insurance centre is in turn rooted in maritime trade. In 1694 with the Royal Navy's financial security the aim since re-equipping was needed yet its capitalization was beyond the Government. The Bank of England was established. The new bank attracted a loan of £1,200,000 (195,265,744 in 2024) raised by subscription. Links with the sea continue today to be commercially and strategically vital to the UK's economy and defence. Current events in the Red Sea demonstrate the rôle of and the country's reliance upon the Merchant Navy and Royal Navy. The supply chain does not consist of just the internet and motorways, some 95% of UK global trade being by sea. 1.6 The Destination City website lists 'Attractions; Experience; Food & Drink; Galleries; Green Spaces; Museums; Restaurants; Shopping; Stay; Theatres and Wellbeing' as the areas of interest on offer. Despite the unrivalled claim

	cited above, heritage is not mentioned. Further, the term appears only twice in the whole website, in referring to the City Visitor Trail which invites such to 'feast on the culture, history and heritage' while noting 'grand heritage hotels' are available. History itself fares little better. The City of London timeline within 'Our Story on the website records but one maritime date, publication of the first Lloyd's Register in 1764 and omits the two World Wars but does mention the Bevis Marks Synagogue's opening in 1701. **2.1** Similarly, what the application proposes for Holland House suggests indifference to its importance, the HCMM thus being obliged to oppose the application. Wm H Muller & Co, a Dutch shipping company, chose Hendrik Berlage to design its London offices in Bury Street. Known as the 'father of Modern architecture in The Netherlands, the result is said to have been the first steel-framed building in Europe. Berlage is believed to have taken inspiration from the work of American architect Louis Sullivan on a visit to the USA in 1911. External walls of grey-green terracotta or faience tiles, made in Delft and shipped in company vessels, top a black granite base. A merchant ship sculpted by the Dutch artist Joseph Mendes da Costa appears at the southeastern corner of the Grade II*-listed building. Construction of the office block, begun in 1914 and completed in 1916, was made possible during the First World War only by The Netherlands' neutrality. It is thought to be the sole building erected in the City during the War. **2.2** In turn, that provides another maritime link, this time with Liverpool Street station. The Netherlands' neutrality in the First World War allowed North Sea ferry services to continue, albeit resented by Germany. Among the refugees and occasional business passengers

	were those of more clandestine intent. Dutch operators' eventual withdrawal from the crossing left only the Harwich-Rotterdam sailings by the Great Eastern Railway Steamship Company. One of its captains was Charles Fryatt of the Mercantile Marine, renamed as the Merchant Navy in 1928. Several times from March 1915, German submarines ordered Fryatt to stop his unarmed ship but instead he made to ram the U-boats or outran them, outraging Germany. Around 0300 on 4th June 1916, German naval vessels stopped Fryatt and the SS Brussels outbound to Harwich. The ship, 45 crew, including five stewardesses, and 100 refugee passengers were taken to Bruges and interned. On 27th July, two hours after a summary court martial, Fryatt, despite being a civilian non-combatant, was shot by firing squad. On 7th July 1919 Fryatt's body was repatriated by Royal Navy destroyer, escorted by two more, to Dover and by train to Charing Cross. The purple-lined luggage van used had served previously for nurse Edith Cavell's coffin and in 1920 for that of the Unknown Warrior. On 8th, Fryatt's coffin was drawn by Royal Navy ratings on a gun carriage, a State funeral honour, to St Paul's for the service, hundreds of thousands lining the streets. The burial was in Dovercourt, Harwich, Fryatt's home. A hospital and pub there bear his name but reaction to what so many newspaper headlines declared as his 'murder' finds it too in Belgium, the USA, South Africa, Mauritius, Australia and New Zealand. In the Canadian Rockies, Mount Fryatt is close to Brussels Peak, named after his ship, while his memorial is on Liverpool Street station. The dedication reads 'From the neutral admirers of Fryatt's portrait appears on this in bronze relief. Beneath, the dedication reads for the first World War period, 'more than conduct and heroic death'. The Netherlands section of the League of Neutral States July 27th 1917, his brave Holland

	House's architectural features would be lost were this application approved. **Officer Response: The impact of the proposed development on Holland House are assessed in the Architecture, Urban Design and Public Realm and Heritage sections of the report.**
Lord Mann of Holbeck Moor HM Government's Independent Adviser on Antisemitism	I write to express my grave concern over plans to build a forty-five-story tower block next door to Bevis Marks synagogue (planning application reference: 24/00021/FULEIA). Bevis Marks, a Grade One listed building, is often heralded by the local community and beyond as Britian's 'Jewish Cathedral'. A building that has thrived for over three hundred years, it is a space of enormous historical and cultural significance. The fact that such a vital community hub is under threat by this development is deeply alarming. The plans have significant implications for the usability of the synagogue, as the building of a tower block along the southern side would totally destroy the setting. Not only would important elements of religious ritual (the view of the moon's passage and many of the celestial bodies) be blocked, the synagogue's natural light levels would be so obscured that the space would be rendered unfit for conducting worship. The historic nature of the synagogue prevents the installation of additional electric lighting as a feasible alternative, leaving no choice but to consider the space unusable. The City of London Corporation, as the municipal governing body of the City of London, has a duty to safeguard the right of the Jewish community to freely gather for worship without obstruction or difficulty. Facilitating the approval of such a development, threatening the vitality of such an essential community space, would fall short of recognising the importance of the synagogue, and in turn supporting London's Jewish community. The idea of building something similar next to St Paul's Cathedral would be inconceivable and inappropriate. The same levels of protection and preservation should be

	attributed to Jewish community spaces like Bevis Marks. At a time of rising levels of antisemitism, and increased fear and uncertainty amongst the Jewish community, the protection of their places of worship and community could not be more urgent. I hope you will take these concerns into account and reconsider the plans for this development, to ensure the life and legacy of Bevis Marks synagogue is protected. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.** **The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. It is noted that although both Grade I listed buildings, with defined immediate setting, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable.** **Matters pertaining the equality impacts of the development on the Jewish community of the Bevis Marks Synagogue are addressed in**

	the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.
Rachel Blake MP	I am writing to express my opposition to Planning Application 24/00021/FULEIA, which proposes the construction of a 43-storey building at 34 Bury Street. It is clear that this application will have a substantively negatively impact on worship at the Bevis Marks synagogue, the oldest synagogue in the United Kingdom, and the oldest synagogue in continuous use in Europe. This new office building would block out the daylight, and the appearance of the moon from the synagogue and its courtyard for much of the day. This would make it impossible to mark the coming of the new moon, key to Kiddush Levana, which has been practiced at Bevis Marks for nearly four hundred years. This application would therefore breach Policy DM 10.8 of the City of London plan, which states that: “To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance; It would also contravene the 2021 London Plan, which stresses in GG1 G that new buildings: “are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods.” These policies are made in mind with the City of London and Mayor of London’s public-sector equality duties under the Equality Act 2010, particularly where this regards fostering “good relations between persons who share a relevant protected characteristic and persons who do not share it”. It is clear that this development would contravene these duties, and therefore I believe that it be refused. **Officer Response: The comments made are noted and are addressed within the report. The daylight, sunlight and overshadowing**

	impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage, the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter, as well as other equality matters are assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.
Nickie Aiken – former MP	Having considered the latest application to develop 31-34 Bury Street, I believe it must not be granted permission. The proposal would have an unacceptable impact on the oldest continuous synagogue in Europe, Bevis Marks, while also having a detrimental impact on the wider Creechurch Conservation Area. It is important to consider the significant impact this development would have on Bevis Marks ability to function. The only artificial light sources within the synagogue are candles and a limited amount of electrical lighting that was installed prior to the building being listed. There are also sensitive issues like the recital of a special prayer at the beginning of each lunar month which would be lost as they require a view of the eastern and southeastern sky. The previous planning application for this site was refused because "The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development". I do not see any reason why this new proposal would not still adversely affect Bevis Marks. In the Heritage Assessment of the previous application, it states "were the proposed development to be allowed it would render the

	designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise". Now that the site does firmly sit within the newly created Creechurch Conservation Area, and as the plans do not significantly change from the previous application, I do not see how this development can be permitted. This development would cause substantial harm to the surrounding Creechurch Conservation Area and must not be allowed to go ahead. **Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.** **The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.** **The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application The previous decision is considered later in this report.**
Blackman Bob - MP	I object to this overdevelopment of the site which will dwarf Bevis Marks Synagogue. This will devastate Europe's oldest continuously used Synagogue.

	Officer Response: Comment noted. The impact of the development on the Bevis Marks Synagogue is assessed in several sections within the main body of the report.
Baroness Deech – Lords Member	It is disrespectful to the neighbourhood, to an ancient and significant building, Bevis Marks, even to non-Jews, to put this enormous building near it. It is essential to preserve and enhance Bevis Marks. **Officer Response: Comment noted. The impact of the development on the Bevis Marks Synagogue is assessed in several sections within the main body of the report.**
Zoe Garbett – Green Party Member of the London Assembly	I have been contacted by constituents from the Jewish community in London about this planning application and its potential impact on the Bevis Marks synagogue. Please accept my apologies for sending this letter after the deadline for comments –I was newly elected to my role as an Assembly Member just three weeks ago. The sole synagogue in the City of London and the oldest in the country, Bevis Marks synagogue has a totemic significance for Jewish people living locally, across London and in the rest of the UK. As one constituent in the neighbouring borough of Islington told me: “as an Islington Jew I sometimes attend myself but in any case have an emotional attachment due to its place in the community's history.” Preserving the character of the synagogue is vitally important in making the City of London a truly inclusive place for people of all faiths. While I appreciate that neither the synagogue or the proposed buildings are in conservation areas, the synagogue itself is a Grade 1 listed building of immense social and cultural value and as such should be protected from harm.

	My constituents, however, fear the proposed development will irrevocably impact the character of the synagogue, both during construction and once the development has been completed. These objections have been laid out by concerned residents and groups, as well as by the Protect Bevis Marks campaign. I urge you to give due regard to the many objections raised and recommended you do not approve this application. **Officer Response: Matters pertaining the equality impacts of the development on the Jewish community of the Bevis Marks Synagogue are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.** **The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.** **Other impacts environmental impacts of the proposed development on the synagogue and its community are assessed in the Environmental Impacts and in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.**

Representations from members of the public (Objections)	**Officers Response to Comments**
Loss of light to the Synagogue	Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its

• The Synagogue is lit primarily by natural light which is an important part of its attractiveness • This is the last remaining section of sky not blocked by high-rise buildings	courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.
Overshadowing to the Synagogue Courtyard • Remaining light is already limited, this will reduce further • Will impact not just worship but enjoyment of the building	Comments noted. The overshadowing impact of the proposed development on the Bevis Marks Synagogue's courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.
Loss of view of the moon in the night sky, and subsequent consequences to specific religious practice • The southern sky view is an essential part of the setting of the synagogue • Viewing of the moon and stars important for	A study assessing the impact of the development regarding the visibility of the sky and the moon has been submitted by the applicant. This Lunar Transit Study has been independently reviewed by BRE. Matter pertaining those impacts are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.

Sabbath and festivals	
There is not a need for more office-space in the City • People are working from home and don't need office space • There is no demand for more offices • No ecological justification to build further high-rise offices • Many vacant offices in other areas such as Canary Wharf	The site within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The principle of the development would be supported by London Plan Policy SD5, which states that higher priority should be given to strategic functions such as offices within the CAZ, to meet demand for office space and facilitate London's continuing role as a World City. At the local level, the City of London's Eastern Cluster is identified in the Local Plan (2015) as having the capacity for significant growth in office floorspace through the delivery of tall buildings on appropriate sites. The intensification of office floorspace in a development of this scale would support the function of the Central Activities Zone and London's position as a World City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business as well as providing agglomeration benefits. Matters relating to the need of office space and the acceptability of the provision of a tall building in this location are assessed in the Principle of Development, Proposed used Architecture, Urban Design and Heritage sections of the report.
The Synagogue must not be harmed from construction work	Relevant mitigation during demolition and construction of the proposed development would be secured by conditions.
Comparison to Development Near St. Paul's • The development would not be permitted adjacent to St Paul's	It is noted that although both Grade I listed buildings, with defined immediate setting, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable.

• Historic places of worship need to be respected equally • This is the only non-Christian place of worship in the City	
Concerns over damage to foundations of the Synagogue	Consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.
Site lies within the Creechurch Conservation Area where tall buildings are against planning policy • A need to protect the historic character of this area from more development • Not in keeping with the character of the area • Since the previous scheme was refused, the Conservation Area has been adopted and therefore the	The impact of the proposed development on the Creechurch Conservation Area is assessed in the Heritage section of the report.

proposed development is even more harmful	
The building will create further issues of wind tunnelling	Consideration of these impacts are contained in the Wind Microclimate section of the report.
Environmental impacts • The demolition of buildings cannot be considered sustainable	Matters relating to sustainability and the redevelopment of the building at 31 Bury Street are addressed in the Sustainability section of the report.

58. Sixty-eight (68) letters of support have been received from members of the public and organisations, as set out in the table below:

Representations from members of the public (Support)
The building's design is attractive, fits in well with the surrounding cluster and creates a sensible step-down from nearby taller buildings • It is welcoming to see this project being revised and resubmitted. It will have a positive effect on the City's skyline. • When seen from vantage points around Tower Bridge, this proposal would appear to the right of a taller tower approved at 100 Leadenhall Street (22/00790/FULEIA). Its comparatively lower height would provide a more gradual transition between the Eastern Cluster and the low-rise buildings beneath it, balancing the view of the cluster as a whole. • It is aesthetically pleasing and constitutes a step down from the taller elements in the cluster. It will contribute to the visual coherence of the City cluster. London is a dynamic city and always changes. • The proposed design is attractive and modern, the slim profile is a welcomed addition • The building will fit in well with surrounding tall buildings in the area
Affordable workspace is a valuable asset for the area

• The provision of affordable workspace to small companies will be very beneficial to new and starting enterprises. At a time of increased cost of doing business, this is very welcome. • The redevelopment of Holland House offers a unique opportunity to support the unmet demand for affordable creative workspaces in the City. This initiative would not only benefit local artists and companies like ours but also contribute to the cultural landscape and attractiveness of the area.
A welcomed juxtaposition between old and new in the area will be enhanced by the design of this building • There are plenty of tall buildings in the City already, which have improved the place. The blend of old and new is part of its charm - there are plenty of churches and other religious buildings nearby which are abutted by tall buildings and are no worse for it. • London is all about the juxtaposition of old and new buildings. New modern buildings help to highlight old buildings, rather than detract from them. This is the case all over the City of London where historic buildings sit perfectly fine side-by-side with modern buildings.
A modern building that will positively affect the local economy and provide more floorspace in the City • The development is high quality design which will help maintain London's position as a premier financial centre and provide a net benefit to the local economy and wider UK economy.
The proposed building is a high-quality design that makes the most of the site potential
Workers nearby will benefit from the added amenities.
The building will provide cultural space which is needed in the City
Amenity space will add value to the area

Example representations from (non-statutory) organisations, groups and individuals (in support)	**Comments**

Param Singh – City Sikhs	I am writing on behalf of City Sikhs, a leading organisation that supports Sikh professionals across London, providing networking opportunities, cultural engagement, and community initiatives that foster a sense of belonging and diversity. We would like to express our strong support for the planning application for Holland House and believe this development will bring meaningful benefits to the City of London. A significant aspect of our support stems from the commitment to providing free-of-charge community spaces within the new and existing premises. Like many community organisations, City Sikhs often encounter difficulties in finding affordable venues in the city to host our events, which range from professional development workshops to cultural and social gatherings. This challenge limits our ability to connect with and support our members effectively. The inclusion of accessible community spaces at Holland House will directly address this longstanding issue. It will allow us to host more frequent and impactful events, benefiting not only our members but also contributing to the cultural richness and inclusivity of the City of London. By enabling organisations like ours to expand our reach and activities, the development will serve as a catalyst for greater engagement and collaboration within the Square Mile. We believe the proposed Holland House development will become an invaluable resource for fostering connections, promoting diversity, and strengthening community ties. Its potential to serve as a hub for cultural, educational, and professional initiatives aligns closely with the values we champion as an organisation. We hope the City of London Corporation will appreciate the far-reaching benefits of this proposal and approve the planning application.
Aslam Baccus - Halls4Jumuah	My name is Aslam Baccus and I am a trustee of the charity Halls4Jumuah in London. Our main purpose is to hire halls and venues across the

	City of London to provide muslim men and women working in the city with a place to perform their Friday prayers. At present, we are hiring six halls within the city, including Holland House in Bury Street, London, EC3A 3BP. We have been using the hall every Friday since the beginning of January 2024 and we manage the venue with the help of our on-site volunteers. To ensure the venue as well as the attendees are safe and capacity is kept under control, we record the names and phone numbers of anyone coming in to perform their prayers. Currently, we have an average of 40 people attending Holland House each week, using a hall that has the capacity to host 150 people. The venue is in an excellent location in London and our numbers are gradually increasing as more people become aware of its whereabouts. The owners of the building have been absolutely first class in providing our charity with their support to allow members of our community access to perform their weekly prayers, and we are always rest assured that the venue is clean, spacious and welcoming. We have benefitted greatly from a review of the proposed development plan and we feel that the idea of turning the Lower Ground, Ground and First Floors into spaces that can accommodate small and local charities as well as community based projects truly inspiring. We at Halls4Jumuah hope the project with be successful and full credit must go to the management of the building who are always a pleasure to work with.
Tony Richards – Museum of Diversity	On behalf of the Museum of Diversity, I am delighted to extend our warmest regards and wholehearted support for the establishment of BGO's multi-use cultural space at Holland House, as outlined in your cultural strategy plan for the City of London (CoL). We deeply admire the exemplary work that BGO has undertaken over the past few years, providing invaluable support to organisations like ours, thereby enhancing representation and diversity within the city. The cultural strategy proposed by BGO promises a rich tapestry of diverse offerings, poised to deliver unique and engaging experiences for those who live and work in the CoL. We believe

	that this initiative will set a new benchmark, not only within the City but also throughout Greater London, reinforcing its status as one of the world's foremost global cities. The Board of the Museum of Diversity and I acknowledge the significant contributions BGO has made in promoting cultural awareness and education within the CoL. The concept of a multi-cultural, multi-use space in London's financial district, tailored to best serve its community, attests to BGO's visionary outlook on the future narrative of urban life. This initiative highlights BGO as a pioneering institution fostering an environment where community voices can shape an agenda reflective of the needs of future leaders across London. Their commitment to growth, cultural enrichment, and educational advancement aligns profoundly with the values of the Museum of Diversity, cementing a strong partnership between our organisations. BGO is at the forefront of embracing change and fostering prosperity among the city's residents and workforce. As they pursue these goals, the presence of the Museum of Diversity will symbolise a significant step forward in our collective journey towards cultural appreciation and understanding. BGO's dedication to supporting diversity and cultural initiatives, as outlined in their cultural strategy, ensures the continuation of programmes that will enrich our societal fabric. BGO's development initiatives, particularly the planned redevelopment of Holland House, demonstrate their dedication to transformative projects that catalyse both economic and cultural growth. BGO envisions the Museum of Diversity as an integral part of the city's landscape, where history, technology, and humanity converge to inspire future generations through unique architecture and exhibits showcasing artifacts from diverse cultures worldwide. Furthermore, the City of London has a rich history of supporting the arts and museums, as evidenced by the success of the Museum of London and other institutions, which have become hubs of community engagement and cultural education. We foresee a partnership with BGO that will enhance our ongoing efforts to celebrate diversity, promote equality, and provide inclusive

	cultural education to all residents and stakeholders. The anticipated establishment of the Museum of Diversity in the City of London is expected to create approximately 300 employment opportunities across various levels, significantly advancing our community's economic landscape. Moreover, the initial phase of this project, with an estimated investment of £1.2 million, will serve as a cultural beacon and a collaborative nexus for partners dedicated to showcasing the rich tapestry of our shared human experience. The Museum of Diversity is ready to collaborate with the City of London to facilitate the establishment of BGO's cultural space at Holland House. We eagerly anticipate discussing the potential design and use of the space and are prepared to assist and support in their application or regulatory processes to expedite this exciting project. We look forward to the Museum of Diversity joining the tapestry of the City's cultural landscape and becoming a beacon of inspiration, learning, and unity. Together, we can create a future where diversity is recognised and revered.
Suzanne Gorman – East London Community Band	I am writing on behalf of East London Community Band in support of the planning application being brought forward by WELPUT for the redevelopment of Bury House, Holland House and Renown House. ELCB is a volunteer-run charity providing music-making opportunities for musicians of all ages and abilities. When it comes to performance spaces, affordable, secular spaces are very rare; we often hold our concerts in churches or school halls, which meet our budget but are often poorly lit, inadequately heated, and not fit for purpose. There is a notable dearth of spaces in the City to rehearse and perform free of charge. On the 29th August 2023, we were invited to tour the spaces within the historic Holland House and to have a discussion about how we could utilise these spaces in future. Following this, on the 27th October 2023 we held our first band music and community social evening on the first floor of Holland House, something which we will look to doing more in future. We currently rehearse in a former Victorian school which is only partially accessible, which is an increasing concern as

	some of our members have restricted mobility. It is a key objective of our organisation to make our sessions available at an accessible site. The proposed development would be especially welcome particularly as the proposals include an auditorium space in a great, central London location. I therefore welcome the proposed application in principle and hope the that the City of London Corporation will approve the proposals, which I hope will make a positive contribution to the long-term cultural success of the City.
Matthew Somerville – Wondering Minds	This is a letter which outlines the use of Holland House by community interest company Wondering Minds CiC for purposes looking to up lift the community. Wondering Minds are a community interest company who are committed to finding alternative solutions to the mental health crisis through art, storytelling and nature. We engage people in meaningful creative activities while building community, creating employment and creating radical therapeutic shifts in peoples lives. So far we have used the space at Holland House for a collaborative filmmaking course which bought together people living with complex mental health to engage with filmmaking and storytelling. The space was used to train people with cameras, allow them to shoot their films and create a community filmmaking screening in July where we bought over 50 people together to watch short films and have meaningful discussions around mental health and the importance of collaboration. Spaces like Holland House are so important to community building as there is very little space available which is free or affordable for people to come together. We have capacity to use HH permanently or on a short term let to create an office and creative hub where we can manage our community wellbeing projects, offer space to people who are in recovery. A space to come and be creative, set up an editing suite for our service users to make work, a location for filming for our participants and create drop-in sessions for people struggling with mental health to engage in creative activities.
Alex Feldman – deputy Headteacher at Dairy	As an experienced primary school teacher and school leader, I have seen my profession change wildly across the last two decades. We are no longer

Meadow Primary and Nursery School	individuals who impart facts to children from the hours of 9.00am to 3.15pm hoping that something sticks, we are now architects of the future responsible for all aspects of child development. All careers of the future start with a seed or an experience that is nurtured within a school setting. Making links with future careers and giving learning a purpose is the bedrock of successful education hence why our experiences at Holland House with Dr Sharon Wright have made such a difference to our children. Just travelling to Holland House helped build the cultural capital of our children. Coming from an incredibly deprived part of West London where most of our children are EAL (English as an additional language) and the progeny are part of an insular community that may not venture out the borough, travelling to Holland House was an eye opener. Getting on the Elizabeth Line, going up an escalator, walking through the City, gazing at the polished metal and glass, seeing workers that may look like them – this is inspirational for our children. Knowing that the financial heartbeat of the country can be reached in less than 30 minutes from Southall and becoming increasingly aware of the fact that the City of London could be a place of future employment frames the educational experience we hope to offer. Then there's the building itself – we teach the skills of comparison all the time in the primary curriculum – nestled next to the Gherkin and dripping in history. Our children had never seen anything like it: the aquatic tiles, the maritime theme echoed throughout, sitting in a boardroom from reclaimed wood – it's the closest some of our children have been to getting on a boat! Couple this with the role of shipping in the founding of Great Britain, it ties in with our fundamental British Values as well as providing a starting point for a conversation on the role of Empire and the decolonisation of the curriculum. The sheer space within Holland House lends itself beautifully to learning experiences for all ages. These workshops are what children remember about school, the people who give up their time and energy to actually guide and inspire – Sharon is the embodiment of this. At Dairy Meadow we were fortunate enough to run three workshops

	together across a two term period. We brought our school council and our Pupil Premium (the most vulnerable of risk of underachievement) children to have a tour of the building and supplement their DT and Skills Builder curriculum by designing sustainable work spaces of the future. The purpose of these visits were to: gain a potted history of London's financial centre, understand the jobs that occur in the city of London and contribute to the positive sustainable changes that they would like to see. A further workshop involved us taking all 53 Year 6 children for a 'world of work' immersion day. This involved meeting the team from Bentall Green Oak and having a series of presentations from inspiring individuals within the construction industry. All of our presenters were female which was an absolute surprise to our young ladies who are often subjected to cultural boundaries when thinking of further employment. From there we had a CV writing workshop and mock interviews! I don't know of any other primary school that has undertaken such an ambitious project, we really couldn't have completed it without the help of Holland House and Dr Sharon. I appreciate that this is just the experience of one primary school however you can not underestimate the impact these visits had for our children. Everything in London is getting more expensive and difficult – as a result the day to day worlds our children inhabit get smaller and smaller. It's only through events like I've mentioned that we can give the children the chance to envisage a life beyond their immediate future and encourage our future workers the chance to dream big. Happy to discuss anything that has been mentioned above, photos and pupil/staff voice available on request.

59. Sixty (60) representations have been receive stating that they have not made a representation relating to the proposed or previously refused development and they want their names to be taken off the contributors list.

Policy Context

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

61. The City of London (CoL) is preparing a new emerging plan, the City Plan 2040, which has undergoing Regulation 19 consultation. The City Plan has been submitted to the Secretary of State and it is anticipated to be examined in public in Spring 2025. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

62. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of no or very limited weight and will not be referred to in this report.

63. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.

64. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise". Other relevant sections of the NPPF are set out in the following paragraphs.

65. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

66. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
    a) approving development proposals that accord with an up-to-date development plan without delay; or
    b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

67. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
    a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
    b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
    c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

68. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

69. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

70. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

71. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

72. Paragraph 103 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

73. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*".

74. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

75. Paragraph 117 states that "*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed*".

76. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that "*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*."

77. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

78. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

79. Paragraph 136 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere

in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'

80. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

81. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

82. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

83. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.

84. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

85. Paragraph 203 of the NPPF advises, "*In determining applications, local planning authorities should take account of:*
    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

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

86. Paragraph 205 of the NPPF advises "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*."

87. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
    a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
    b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

88. Paragraph 208 of the NPPF states "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*".

89. Paragraph 209 of the NPPF states "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

90. Paragraph 212 of the NPPF states "*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*."

Statutory Duties

91. The Corporation, in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

92. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

93. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

94. In considering whether to grant listed building consent the CoL is to have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses (section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990.

95. In considering the planning and listed building applications before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.

Main Considerations

96. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

97. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.

98. The principal issues in considering this application are:

a) The principle of development, including the appropriateness of the proposed uses, including the proposed office use, the flexible community/education/cultural/amenity offer and other flexible retain uses.
b) The economic impacts/benefits of the proposal.
c) The appropriateness of the site to accommodate a tall building.
d) The impact of the of the development on the character and appearance of the area and the design of the building itself.
e) The impact of the proposal on the Tower of London World Heritage Site.
f) The impact on strategic views in the London Views Management Framework and on other strategic local views.
g) The impacts of the proposal on the setting and significance of heritage assets.
h) The proposed public realm benefits and cultural/community/educational offer
i) The potential impacts of the development on buried archaeology.
j) The impacts of the development in terms of accessibility and inclusivity.
k) The impact on the development in highway and transportation terms and cycle parking provision.
l) The impact of the development in terms of energy, sustainability and climate change.
m) The impact of the development on ecology.
n) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, air quality, building resource efficiency, energy consumption and sustainability.
o) The impact of the proposed development on the amenity of nearby residential and other occupiers.
p) The impacts in terms of security and suicide prevention.
q) The outcome of the Health Impact Assessment.
r) The impacts of the development on fire safety.
s) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
t) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights.
u) The requirement for the development to secure financial contributions and other planning obligations.

Principle of Development - Economic Considerations

99. The National Planning Policy Framework places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. Significant weight is to be given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to the economic benefits will depend on the nature and

extent of those benefits in the light of any other planning considerations relevant to the assessment.

100. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.

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

102. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

103. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. That policy does not require a decision maker to assign a uniform level of weight- the weight to be ascribed to the economic benefits depends upon the nature and extent of the benefits in the light of any other planning considerations relevant to the assessment. The NPPF (at paragraph 87) also states that planning decisions should recognise and address the specific locational requirements of different sectors.

104. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

105. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

106. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design–led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.

107. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

108. In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross

during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

109. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.

110. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 and within the City Cluster Tall Buildings area identified in the draft City Plan 2040. The Cluster Policy area is defined by an illustrative diagram on the Policies Map in the adopted and a more detailed map in the emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements by, *inter alia:*

- Increasing the provision of attractive world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers;
- Encouraging complementary uses including leisure, culture and retail to support the primary office function in this area and providing active frontages at ground level.
- Requiring the provision of new and improved open spaces at ground level, free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.

- Delivering tall buildings on appropriate sites in line with Policy S12 (Tall buildings) ensuring they positively contribute to the City's skyline, preserving heritage assets and their settings, taking account of the effect on the London skyline and on protected views;
- Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map). 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.
- Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
- Delivering a high quality public realm, maintaining the quality of the microclimate and increasing urban greening;
- Activating streets, spaces and public realm at the ground floor and improving wayfinding through the streets and alleys;
- Improving walking and cycling into and through the Cluster. Pedestrian movement should be given priority through re-allocation of road space on key routes during daytime;
- Ensuring the provision of high quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
- Ensuring an area wide approach is taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high quality public realm and environment that reflects the status of the area;
- Introducing new approaches to freight, construction logistics and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth.

111. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporations 'Destination City' vision for the square mile.

112. The proposed development would provide a primarily office lead development, providing a significant uplift in the number of full time jobs; namely from 330 to

2,470 full time jobs, as well as a material uplift in the office floorspace; namely from 10,064 sqm to 34,584sqm. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and weigh in favour of the proposed development.

Proposed Uses

113. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the proposed uses:

- 34,584sq of office floorspace.
- Flexible retail space at ground floor, along the Heneage Arcade, Renown House and the southeast and southwest (near the open space) sections of Holland House at ground floor.
- 300sqm of learning spaces at the ground floor (northeast section) of Holland House
- 750sqm of workspace for small enterprises, including meeting rooms, workspace and event space at part ground and part first floor of Holland House (8 meeting rooms).
- 1,170sqm of flexible community/affordable workspace at part of the first floor of Holland House and first floor or Renown House (60 desk spaces).
- 750sqm of flexible creative/education/cultural floorspace at the lower ground and ground floors of Holland House, including 40sqm of gallery space.
- Provision of multi-faith space either at the lower ground of Holland House or at the first floor of the tower.
- Provision of rehearsal/event space/sports facilities at the first floor of the tower. The rehearsal/event space can provide 110 seats, which the space would be used for sports facilities including option such as a pickleball court, 3x3 basketball court, cricket nets, badminton courts and table tennis.
- Provision of workspace for cycle repairs (City Cycles) at the lower ground of Renown House, part of Holland House and the tower. This proposed use would generate up to 10 apprenticeships.
- Provision of 120 sqm of outdoor space (urban farm).

A breakdown of the existing and proposed uses (GIA) is set out below:

Land Use	Existing	Proposed
Office (Class E(g)(i))	11,339 sqm	34,584 sqm

Display/sale of goods other than hot food (E(a))	0 sqm	504 sqm
Flexible educational/ cultural/ community/ sports/ amenity space	0 sqm	1,411 sqm
Back of House/ Ancillary	0 sqm	4,794 sqm
Total	**11,339 sqm**	**41,293 sqm**

Provision of Office Accommodation

114. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

115. The predominant use of the proposed development is as office space, comprising of 34,584 sq.m (GIA) of Office Floorspace Class E (an uplift of 24,520 sq.m (GIA) of office floorspace on this site. The office space is classified as Grade A office space.

116. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. The draft City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace; which approximately equates to 1.6 million square metres gross, in the period between 2021 and 2040. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.

117. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or

was permitted in the City. 370,000sq.m of flexible office floorspace was approved in 2022.

118. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000 – 770,000 sqm. The proposed development would deliver a considerable amount of this floorspace target providing an uplift of 24,520 sqm delivering 1.5% towards achieving the total office floorspace (1.6 million sqm gross) to be delivered by 2040 as required by the City Plan 2040. The site is central to the City's growth modelling.

119. The typical floorplate of the proposed tower would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses. The proposal provides an option for potential office tenants who are looking for a smaller area that is not provided in a shared space in co-living office formats. The proposed smaller office floorplates would be able to provide office tenants with their own private entrance and dedicated floor rather than sharing with other tenants, which will ensure that the floorspace is attractive to a range of potential occupiers. The Future of Office Use (June 2023) which formed part of the evidence base for the emerging City Plan stated that "*Long term growth prospects appear good in our scenarios, with the City requiring 6 – 20 million sq ft of additional office space by 2042. Much of this will be high quality office space for smaller employers*". This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers

120. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space.

121. Policy OF1 of the emerging City Plan 2040 states that office developments should where appropriate, provide a proportion of affordable workspace suitable for SMEs. The proposed development includes the provision of 1,176 sqm of 'Community Workspace' at the first floor of Holland House comprising restored historic meeting room space and affordable office space with 60 desks which will be available at 50% of market rent for qualifying occupiers or zero rent for charities. This would fulfil the City's vision to providing inclusive workspace. The S106 agreement would include an obligation to secure and require further details of such provision.

122. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line

with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed Retail/Food and Beverage

123. Policy DM 1.5 encourages mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.

124. The proposed scheme would provide 504 sqm of flexible retail/café space at ground floor level. The retail space would be accessed from several entrances at ground floor, along the Heneage Arcade, Renown House and the southeast and southwest (near the open space) sections of Holland House.

125. The policy requirement is for these 'town centre uses', as defined within the NPPF, to be provided primarily in Primary Shopping Areas, then Retail Links and then outside of them. The site is not within a Principal Shopping Centre or along a Retail Link as defined by the City of London Local Plan 2015 and the emerging City Plan 2040. Inclusion of main town centre uses in this location is in accordance with the local plan which encourages such uses relying on policy DM1.5.

126. The proposal would provide seven times more active frontage than currently exists. The provision of an active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that "*The City Corporation will seek to make the City's retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City*". The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

Cultural/Community/Educational/Sports/Multi-faith/Amenity uses

127. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's

communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:

- *Providing, supporting and further developing a wide range of cultural facilities.*
- *Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.*
- *Protecting existing cultural facilities where they are need.*
- *Providing visitor information and raising awareness of the City's cultural and heritage assets.*
- *Allowing hotel development where it supports the primary business or cultural role of the City.*

128. The emerging City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

129. Local Plan policies CS22 and DM 22.1 support the provision of community services. It is advised that development of "*new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*

- *where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
- *in locations which are convenient to the communities they serve;*
- *in or near identified residential areas, providing their amenity is safeguarded;*
- *as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses."*

130. Similar requirements are set out in policy HL5 of the Emerging City Plan, which expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range if uses. These spaces are considered making a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education.

131. Policy DM19.3 supports the provision of new sport and recreational facilities and encourages the provision of flexible space to accommodate a range of different uses that are accessible to all, at locations that are convenient to the communities, near existing residential areas, where they do not cause undue disturbance to neighbouring occupiers. Similar support is set in Policy HL7 of the emerging City Plan.

132. Policy DM 1.5 encourages mix commercial uses within office development. Complementary uses, include within others retailing, leisure, education and health facilities to contribute to the City's economy, character and appearance.

133. Strategic Policy CS22 supports the provision of health, social and educational facilities and opportunities for the City's residents and workers.

134. Functions of state health, education, creativity and cultural activities are also supported by Policy SD4 in the London Plan within the CAZ area.

135. As noted above, the proposed development would provide an area of 1,411sqm GIA of community, education, cultural, sports and amenity facilities, at lower ground, ground and first floor, primarily within Holland House. There will be two main parts of the proposed flexible space, the 'Holland House Hub', which would include classrooms, flexible immersive room and other rooms and the 'Creechurch Hall', which would be a multifunctional space for a range of uses including lectures, presentations, rehearsals space, sports area and multi-faith space.

136. The flexible spaces would be used for a variety of events, including charity, educational, cultural, social, multi-faith and corporate events and they are proposed to be free to use to qualifying users between 8am – 9pm on weekdays and 9am - 5pm on weekends, with private bookings outside those hours (save that Creechurch Hall will be available for 67.75 hours per week free of charge and for 13.25 hours for private hire during these hours). The majority of these uses have already been tested within Holland House through a collaborative process involving discussions with over 80 stakeholders, including education institutions, sporting organisations, charities, social enterprises and community groups, arts and culture organisations and multi-faith groups.

137. The provision of cultural/community/educational/amenity offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation, community and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

138. A cultural plan accompanies the application in accordance with policy CV2 of the draft Local Plan 2040. The plan analyses the City's existing cultural

infrastructure and sets out how the proposal would support the City's continued role as a destination. Further details about the proposed plan are discussed below.

139. Through consultation with charities, educational institutions, sports organisations and arts, culture and faith groups, different needs have been highlighted, including:

- Provision of work experience opportunities in the City
- An accessible space for a school trip
- Active learning
- Affordable space to host events
- Meeting rooms and workspace
- Access to indoor sports facilities
- Space for community sporting events and tournaments
- Encouragement of the community to get more active
- Flexible event/rehearsal space
- Space that is available in the evenings and weekends
- Volunteer and sponsorship opportunities
- Calm and quite space
- Auditorium space for services

Holland House Hub

140. A large area of Holland House, at lower ground and ground floors will be opened to the public for the first time to be used as venue for learning, creativity and culture. At ground level there will be an approximate area of 300sqm which would be mainly used as learning space for schools and community groups and it will split into two areas, the learning space and the exhibition centre. This would provide an opportunity for young people to experience the City of London and this historic building while getting informed about future career opportunities. This space would also be able to be used from local groups for hosting events.

141. Holland House Hub would be available all days of the week, between 8am and 9pm on weekdays (65 hours) and 9am till 5pm (16 hours) on weekends. It would therefore be available for a total of 81 hours a week. Of those hours 12 hours a week and 5 days a year would be available to be hired privately, resulting in 67.75 hours per week free of charge use.

142. Creative space is proposed at the lower ground. This would be 750sqm and would be available for creative, educational and cultural activities. An immersive room is proposed at the lower ground, providing a dedicated space where technology and history collide to engage visitors with the art and history of the

building, primarily supporting the educational programmes that are proposed at Holland House.

143. The cultural plan is also supported by ‘week in the life’ information for the Holland House Hub. The week table has been split into morning, afternoon and evening sessions for the weekdays and morning and afternoon sessions for the weekends. As this is proposed to be a multi-functional space, different uses are proposed at each session of the week.

144. The learning space would be used, within others, for educational workshops, school trips, work experience student visits, building future skills workshops, language lessons, Sunday church school, trustee meetings and it will also be available for booking for approximately 4 out of 19 sessions in a week.

145. The creative space would be used for several workshops, including art and design, artist drawing, global trade, educational and history of the building workshops, filming marketing material, creative hub sessions and programme events on Sudays.

Creechurch Hall

146. Creechurch Hall would consist of one area at the first floor level of the tower element. This would be a community led, flexible space designed to be used for multiple purposes, including rehearsals, performances, conferences, charity events, sports tournaments, faith events, and weddings.

147. Similar to Holland House Hub, Creechurch Hall would be available all days of the week, between 8am and 9pm on weekdays and 9am till 5pm on weekends, being available for 67.75 hours per week free of charge and for 13.25 hours for private hire.

148. The versatile space would be equipped with retractable seating providing 110 seats, fostering artistic growth and community engagement. It is intended that the space would be used to host faith groups, charity events, music and drama workshops, as well as providing additional space for nearby schools. The aim would be to create a space where ideas are shared, skills are developed and community gets together. The space would be provided free to community partners and would be able to be hired at lower than the market price privately.

149. The area would also be able to be transformed to indoor sports space with dedicated hours for each sport, offering the following facilities and equipment:
- Pickleball courts

- 3x3 basketball court
- Cricket nets
- Two badminton courts
- Eight table tennis tables

150. The ‘week in the life’ timetable shows an example of how the space would be used during the weekdays and weekends in the morning, in the afternoon and in the evening (excluding weekends). Within others there will be times dedicated for sports, community music workshops, fundraiser events, performances, Friday prayers and Sunday schools.

151. It is therefore considered that, subject to a Community/Educational/Cultural/Sports/Amenity Implementation Strategy being secured in the S106 agreement to secure a year-round Programme which would establish monitorable deliverables in curation of the spaces for education workshops, school visits, sharing of knowledge and skills, cultural activities and events, sports tournaments, faith, social and charity events, rehearsals and performances, which would respond to the needs of the local and wider area and be informed by a continuing dialogue with stakeholders, users, visitors, the local community and building users, the policies referred to above would be complied with.

Other associated public offer elements

Urban Farm/ Climbing Wall

152. Policy DM10.3 ‘Roof Gardens and Terraces’ of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not immediately overlook residential premises; adversely affect rooflines or roof profiles; result in the loss of historic or locally distinctive roof forms, features or coverings; impact on identified views. It is also noted that public access will be sought where feasible in new development. Policy DE4 of the Emerging City Plan also requires that the roof terraces are visually integrated with the overall design of the building and they optimise the potential for urban greening.

153. At the ninth-floor terrace, on top of Holland House an outdoor classroom and accessible terrace for the tenants is proposed to be designed. This would be accessible via a dedicated lift and would be open to all tenants, including those using the community workspace. The rooftop classroom would be able to provide nurturing environment for learners to explore and urban greening. It is proposed that the Urban Farm would offer the chance to facilitate a small level of food production and partner with initiatives such as Capital Growth.

154. By reason of the orientation of the terrace, intervening tower element of the development and distance from the nearby residential properties, it would not overlook any residential units. This is further assessed in the 'Impact on the residential amenity' section below. The impact of the proposed development and roof terrace on the historic building, its roof profile and identified views is assessed in the 'Design and Heritage' section below.

155. The proposal also involves the creation of an outdoor climbing wall on the façade of the tower fronting St James' Court. This would be open to the public and would offer regular climbing sessions. This would encourage health and wellbeing and support the provision of new sport and recreational facilities and encourages the provision of flexible space to accommodate a range of different uses that are accessible to all.

Public Art/Cultural offer and Heritage

156. As noted above, Holland House and in particular an area of Holland House Hub would be used as art exhibition space for permanent and rotating exhibitions of City and Guild students and local artists to display their work. Furthermore, historical elements and artwork is proposed to be displayed along Heneage Arcade to educate public about heritage. Other art initiatives would include art competitions for local schools including one round hoarding design, provision of space for artists and creatives to host micro workshops and galleries and tours within the community space of Holland House. The provision of public art and all the abovementioned art initiatives would be secured via S106 obligations.

Ground level Public Realm

157. The proposed landscaped public realm, St James' Court, to the southeast of the tower element would provide an area open to the public at all times with seating to be used by workers, visitors and residents. Part of the area would be covered under the colonnade, incorporating local artist work installations.

158. A route through, Heneage Arcade, will be created traversing the tower at ground floor linking Bury Street with Heneage Lane, to reintroduce a historic City route. Along the new route through there will be retail units, activating the space.

159. Further details on the operation of the public realm would be secured through the cultural strategy and the public realm management plan.

Changing Place/ Public Toilet/ Drinking Fountain

160. London Plan Policy S6 states that large-scale developments that are open to public should provide and secure the future management of free publicly-accessible toilets suitable for a range of users, including disabled people and free 'changing places' toilets designed in accordance with the guidance in the British Standard BS8300-2:2018. Similar standards are set in policy HL6 of the emerging City Plan 2040. A widespread distribution of public toilets to support demand is also required by policy DM22.2 of the Local Plan 2015.

161. The proposed development would incorporate a 'changing place' accessed via the office reception along Heneage Arcade. The 'changing place', as designed appears to not meet the current British Standards. However, it is considered the ground floor area is not so constrained as to render it impossible to provide one that meets the minimum requirements in terms of dimensions and facilities. For that reason, it is considered reasonable that a condition is imposed ensuring that the 'changing place' proposed is provided in accordance with the British Standards. This facility would have to be made available to the public for the duration of the use of Heneage Arcade (between 7am and 11pm).

162. The proposed development also includes an accessible toilet between Renown House and Holland House. Further toilets, including an accessible toilet are proposed within Holland House. Although the toilets within Holland House would be accessible from the users of the visiting the Holland House Hub, the accessible toilet between the two buildings can be made publicly accessible. A condition will be imposed ensuring that this accessible toilet, which is easily accessed via the step free entrance of Renown House would be made available to the public for the duration of the operational hours of the area, between 7am and 11pm. The public facility would have to be advertised at the entrance of the building.

163. The provision of free drinking water at appropriate locations in new public realm is highlighted in both policy D8 of the London Plan and policy DE3 of the emerging City Plan. A drinking fountain is proposed to be installed along Heneage Arcade. A condition to secure the details and its provision for the lifetime of the development would be secured by condition.

164. Maintenance of the abovementioned facilities would be secured via a planning obligation in the S106 agreement.

165. Subject to the imposition of the abovementioned conditions, it is considered that the proposed development would be able to secure significant benefits to meet the needs of the area and its users and would promote equality of access to much needed facilities.

Cycle Repair space

166. The Proposed Development includes the delivery of dedicated cycle repair space at lower ground floor level within the tower element of the scheme and renown House. In particular, three cycle repair stations are proposed. This social enterprise would support young adults in offering bike mechanic training and jobs servicing the office tenants' bikes in addition to providing a street presence in Heneage Lane to serve the local community.

167. This offer would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community in accordance with policies CS4 and CS22 of the Local Plan.

Conclusion

168. It is considered that the proposal would deliver a compelling new community/educational/cultural/amenity/sports offer for the City that would align with the Destination City agenda. Final details of the operation and marketing of the spaces, uses and public art would be secured through the S.106 and as part of the Implementation Strategy. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies CV2, HL5, HL7 and DE4 of the emerging City Plan 2040.

Architecture, Urban Design and Heritage

169. The relevant local policies for consideration in this section are CS7, S10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, CS12, CS12, DM12.1, DM12.2, DM12.3 CS13, CS14, CS16 and DM16.2 of the Local Plan (2015) policies and HL1, S8, DE1, DE2, DE3, DE4, DE8, S11, HE1, HE3, S12, S13, S21, AT1, of the emerging City Plan 2040, and London Plan (2021) policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4 and GG1-6.

Principle of a Tall Building

170. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12 (1), >75m AOD) and London Plan D9 (A).

171. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4.

It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

172. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the draft City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

173. The application site is in the Eastern/City Cluster and as such is identified in these Plans as a suitable location for a tall building in the strategic sense; for the spatial purposes of London Plan policy D9 (B), the application site, due to its Cluster location, is in a location identified as suitable for tall buildings in the Development Plan. In its Stage 1 letter the GLA state that 'in line with London Plan policy D9 B (3)' the site is located in an area which is potentially suitable for tall buildings.

174. This location makes the application site important to the City's growth modelling, the significant majority of which will be accommodated in a consolidating City Cluster of tall buildings and would deliver 34,584 sqm (which is c.1.5%) of the required commercial space to meet projected economic and employment growth demand until 2040. This strategic quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.

175. The proposal is in the proposed City Cluster Tall Buildings Area and would comply with the contour lines of the proposed City Cluster as set out in the draft City Plan 2040. The shoulder of the lowermost part of the massing would, in the language of draft policy S12, mediate successfully between the 90m and 100m contour lines which relate to that part of the site; and the top of the building, at 178.7m AOD, would sit comfortably below the 180m and 200m contour lines which relate to the rest of the site. As such, it would accord with the objectives of the proposed City Cluster contour lines, which are to minimise the possibility of harm being caused to the settings and significance of the three Strategically Important Landmarks, including the WHS.

176. At a more local level, the proposal is located in the Creechurch Conservation Area which lies within the City Cluster. Adopted Local Plan 2015 policy CS14 (2) states that the City will refuse planning permission for tall buildings within 'inappropriate areas' including conservation areas. Thus, at this level, the application site would be inappropriate for a tall building because it is in a conservation area. For clarity, this aspect of the policy is not included in the draft City Plan 2040.

177. The proposal would be in the Eastern/City Cluster Key Areas of Change in both the 2015 and 2040 Plans. Whilst it draws in-principle support from the fact that the site lies within the identified Cluster, the proposal would conflict with Local Plan policy CS7 (3), due to its location also within a conservation area, and with emerging policy S21 (5), as it does not preserve the significance of grade II* listed Holland House. In respect of the latter, the City Plan 2040 is about to undergo Examination in Public and consequently its provisions can be afforded only limited weight.

178. Because of the conflicts with Local Plan policies CS7 (3) and CS14 (2), the proposal would not be a site or in an area identified as suitable for a tall building, and this would mean that the proposal would not comply with D9 B (3).

179. In *R (oao LB of Hillingdon) v. Mayor of London* [2021], the High Court held that London Plan policy D9 B was not a pre-condition or 'gateway' to the application of the criteria in D9 C. In other words, even where a proposed tall building falls outside an area identified as suitable in a Development Plan under part B, the impact of the tall building as set out in Part C should still be considered.

180. As such, an assessment against London Plan policy D9 (C) and (D) is made below, with reference to other sections of this report for more detail. It is found that the proposal would largely satisfy the criteria in (C) and (D) and, most relevantly, the proposal would not cause harm to the significance of the Creechurch Conservation Area.

181. As such, the proposal is considered to comply with London Plan D9 C and D, but would conflict with D9 B (3), Local Plan policy CS7(3) and CS14 (2). This conflict with a Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

182. The effect of policy CS14 (2) is to indicate that planning permission should be refused for tall buildings within a conservation area, being an inappropriate area for the purposes of the application of the policy. The policy does not require that every application for a tall building in a conservation area must be refused; other factors should also be considered. After considering the impacts of the proposed tall building in the assessment that follows, and in particular because it has been concluded that no harm would be caused to the conservation area as a result of the proposed development, and as the London Plan policy D9 C criteria area satisfied, officers consider that the principle of locating a tall building on this site in the defined Eastern Cluster is acceptable, notwithstanding the conflict with CS14 (2). The proposal is supported by adopted policy CS1, which seeks to ensure the Cluster can accommodate the Plan's significant growth in office and employment floorspace, whilst drawing support from CS14 (1) (Tall Buildings),

which seeks to consolidate tall buildings where they are least impactful on the strategic heritage and character of the CoL and London. This balance is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies.

183. The GLA Stage 1 Letter states defers judgement on London Plan Policy D9 until stage 2 of the decision making process (this occurs once the application has been considered by the local planning authority).

Tall Building – Impacts

184. The site is in the centre of the City Cluster, a carefully curated collection of tall buildings which serves as the heart of the City and London's financial and insurance industry. The City Cluster is an established part of the City's and London's skyline and its long-term consolidation and curation is anticipated under the draft City Plan 2040. The relationship of the proposal to the composition of the City Cluster has been carefully considered in a range of long, mid-range and immediate views.

185. This section assesses the proposals against the requirements of policy D9 (C) (1-3) and (D) of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment follows on below in the 'Architecture and Urban Design' and 'Strategic Views and Heritage' sections.

Visual Impacts

186. At ground plus 43 storeys (178.7m AOD), the proposal would be one of the lower towers in the City Cluster, commensurate with its status as a tower proposed at the Cluster's edge rather than its centre. Comparison is given below with the other existing and consented tall buildings in the Cluster (in descending AOD height order), with the proposal noted in **bold**:

- 1 Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate: 284.68m (resolution to approve)
- 100 Leadenhall: 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m

- 30 St Mary Axe (the ‘Gherkin’): 195m
-
- Leadenhall Court: 182.7m
- Bury Street proposal to which this report relates (178.7m)
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m

187. The impact of the proposals upon the City and wider London skyline has fundamentally informed the design-led optimisation of the site and officers support the overall form and massing strategy. This represents an efficient use of the site, that would form part of the heart of a dense, consolidating cluster of tall buildings including 122 Leadenhall Street (the Leadenhall Building), 22 Bishopsgate, 55 Bishopsgate, 100 Bishopsgate, 100 Leadenhall, 30 St Mary Axe and Tower 42.

188. The proposal would take the form of a pale blue faience tower massed in three stages: broadest at its base, then slenderer in its middle section and slenderest in its topmost stage which reach approximately the height of the Gherkin. Its height and massing have been fundamentally informed by the most important view it has the potential to affect: that from Tower Bridge of the Tower of London World Heritage Site, although consideration has been given to its presence in a great number of other views too, as set out the sections below. The height and massing proposed would ensure the proposal reads as clear endpiece to the eastern edge of the Cluster, of a height commensurate with its position at the edge rather than the centre.

189. In relation to long range views D9 C (1; a; i), the proposal would form a clear endpiece to the eastern edge of the City Cluster. As such it would be clearly visible in the long-range views from Greenwich and Blackheath, positioned in front of the Gherkin. Due its position, it would otherwise be largely or fully occluded by the existing Cluster buildings in the views from the northern hills. As such, the siting and height of the proposal would ensure it reinforces the edge of the Cluster rather than creating a more conspicuous change in these views; as such, the development would comply with Policy D9 C (1 a; i)

190. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), much of the comments and objections from statutory consultees, including from Historic England, Historic Royal Palaces, the GLA and others relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

191. In both baseline and cumulative scenarios, in mid-range views particularly from the south-east, east and north, the proposal would appear on the eastern edge of the Cluster, intrinsic to reinforcing and defining its overall silhouette and form. From Tower Bridge and The Queen's Walk, it would appear as a clear endpiece to the emerging Cluster, of a scale commensurate with its position as an edge rather than more central component of the Cluster. From the east, including from Whitechapel Road and Commercial Road, the development would also be perceived as part of the Cluster, standing at a clearly subsidiary scale before the taller buildings at the apex of the Cluster, while in views from the north, including from Shoreditch High Street, it would be less visible, glimpsed as part of the Cluster's stepping down to the east.

192. Due its position on the eastern edge of the Cluster, the proposal would be mostly screened in views from the south west and west, glimpsed in some of the views from the Thames bridges but otherwise largely occluded. In views from Fleet Street, the development would be completely screened by existing buildings in the Cluster, maintaining the primacy of St Paul's Cathedral.

193. From these mid-range distances, the observer would begin to experience the elegant form of the proposals, with its sophisticated pale blue faience becoming apparent and edging the Cluster with pleasing solidity. The highly distinct façade of the building would calmly stand out from the rest of the fully glazed buildings in the Cluster and help to emphasise its status as an edge component. In relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

194. In relation to immediate views, London Plan D9 C (1; a; iii), the proposal would be located in the western zone of the Creechurch Conservation Area where it meets the heart of the City Cluster. The tower element of the proposal would, in the majority of local view experiences, such as from Gherkin Plaza, Bevis Marks, the Synagogue Courtyard and Aldgate Square, be seen rising behind the low-rise buildings in the foreground of these views in a manner entirely characteristic of this intensely developed part of the Cluster. Its pale blue faience elevations would form a high quality new addition to this dynamic townscape character. The tower element would be seen coming to ground in the views along Creechurch Lane and along Mitre Street, where it would be seen to form a high quality new landmark in the locality, particularly in the views along Mitre Street. have a landmark quality.

195. The proposed development has been designed to activate the ground floor and to optimise inclusive public realm around the footprint of the tower element through Heneage Arcade and James' Court; it would bestow new uses upon the lower levels of Holland House and Renown House and open them up to a wider demographic. The building would provide new and interactive frontages on all sides of its tower element, that would be of pedestrian scale that engage and

acknowledge the historic context and specifically the neighbouring medieval churches. Active frontages, urban greenery and high-quality architecture would invite people to the site as a destination, place to linger or connection route through this eastern edge of the Cluster. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

196. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would be an important and clear endpiece to the eastern edge of the Cluster in key views from the south, south-east and east, playing an important role in consolidating the Cluster's skyline view and presence when seen from these areas.

197. In this, and like other conspicuous Cluster schemes, it would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital, where the Cluster identifies the original commercial heart of London since Roman times.

198. As assessed elsewhere in this report, at a macro character and identity level, the consolidation of the Cluster achieved by the proposal would allow the observer of strategic views to better orientate themselves, assisting in a recognition and appreciation of other strategic London landmarks as part of a more coherent whole. In local views the proposal will assist in consolidating the Cluster form so that its form can be further reinforced. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

199. In relation to D9 C (1; c), the architectural quality and materials are exemplary and would be maintained through the life span of the proposal and this is elaborated upon in the 'Architecture' section below. The tower would be visually split into four main parts: the triple-height base incorporating the Heneage Arcade, the podium block, the slenderer tower above and the slenderest crown element of the tower. This stepped profile would achieve an elegance, particularly in views form the south and south-east, that would be enhanced by its dressing in high-quality and subtly articulated pale blue faience elevations. The roof extensions to Holland House would be highly discreet in relation to the important original views of the building, and of a recessive and high-quality terracotta presence in longer views. Overall, the architecture is clearly well-considered in the round and of a high quality, would be visually distinctive and an attractive addition to the skyline in of itself, compliant with D9 C (1; c).

200. In relation to D9 C (1; d), a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified that the proposal would cause a low level of less than substantial harm to the significance of Holland House (grade II* listed) through the roofing over and infilling of part of its atrium.

201. Historic England have identified harm arising to a number of heritage assets, at the middle to low range of less than substantial, including the Tower of London WHS, Bevis Marks Synagogue, Holland House and Creechurch Conservation Area. Their conclusions on harm to the WHS and the Synagogue are shared by many other objectors.

202. The GLA have identified that the proposal would cause less than substantial harm, from the middle to the low range, to a number of heritage assets. They state that "The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to designated heritage assets. Nonetheless, further information is still needed to confirm impacts in full. The final NPPF paragraph 208 balance will be carried out at the Mayor's decision-making stage.

203. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for the proposed development. The development would optimise the capacity of the site and deliver an essential contribution of required office space as is set out in the office section of this report. To optimise the site, while minimising harm, alternatives have been explored, including numerous iterations of the height and massing profile of the tower in order to arrive at a comfortable presence in relation to the Tower of London WHS, and the quantum, positioning and architectural design of the roof extensions to Holland House and Renown House.

204. While the adverse heritage impacts to Holland House are not entirely mitigated, they have been minimised by a design-led approach which has included the exploration of alternative forms of development; the proposal is considered to strike the right balance between conservation and growth in optimising the site and clear heritage and public benefits flow from the development and outweigh the harm identified. This is detailed in the planning balance section of the report. As such the proposal is considered to comply with D9 C (1; d).

205. In respect of D9 C (1; e), the proposal's siting at the eastern edge of the Cluster means that it would be visible to varying degrees of prominence in relation to the Tower of London WHS. As mentioned, this has been the focus of many objections to the proposal, including from Historic England and Historic Royal Palaces. The proposal has been found through detailed analysis, referred to later in this report,

not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. In relation the view from Tower Bridge, the focus of the objections and where the juxtaposition between the proposal and the WHS is acutest, the proposal would have a slender, tapering profile which would be appropriately deferential to the WHS and be commensurate with its status as an edge component of the Cluster. Officers consider that the proposal's strategic siting within the long-established and consolidating Cluster backdrop, and its intervening distance from and height in relation to the WHS, would mean that it would preserve the OUV of the WHS and comply with D9 C (1; e).

206. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. It would form a clear eastern endpiece to the consolidating City Cluster. Due to its location at the eastern edge of the Cluster, its distance and intervening built fabric layering, as well as its strategically driven height aiming to consolidate the cluster, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).

207. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be minor adverse but the effects are not significant, as discussed in the relevant section in this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9 C (1; g) of the London Plan.

208. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

Functional Impact

209. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants and are considered to be in accordance with London Plan Policy D9 C (2; a).

210. The proposed servicing strategy would utilise the existing servicing area of Valiant House. Vehicle bays for servicing and deliveries would be positioned towards the northern edge of the site, off Heneage Lane, these loading bays would provide access to the building management facilities within the basement of the site through goods lifts. This arrangement and positioning of the servicing bay is considered to be the most suitable position for unloading/loading activity considering the other edges of the site, where pedestrian footfall is likely to be higher and where there could be a greater degree of conflict between users.

211. The proposed Framework Delivery and Servicing Plan includes significant consolidation. The FDSP would ensure that deliveries are managed and time-limited for safety. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). The servicing bay, and the associated hours of operation, have been considered to minimise the impact on the surrounding public realm and pedestrian routes. Out of hours servicing, and the hours of closure on the Heneage Arcade, would work in conjunction with pedestrian desire lines. Further details in respect of the servicing approach are set out in the Transportation section of this report.

212. Entrances at ground floor level would provide access to the public and office spaces throughout the building. The entrance doors would be set into glass façades to enhance transparency and extend the external public space into the ground floor receptions and retail spaces. The public ‘heritage lobby’ entrance doors and reception lobby for access the publicly accessible areas and the office floors would be positioned on the Heneage Arcade, furthermore, the lobby’s and lifts have been sized to accommodate visitors to the building. This access arrangement, off Heneage Arcade, would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. This is in accordance with D9;C;2;c.

213. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the highway which will be developed in detail as part of the S278 agreement. The S106 agreement will require the developer to enter into a S278 agreement with the City of London to

undertake any works to mitigate the impact of the development in accordance with (D9;C;2;c).

214. In particular, the provision of cultural space, community space, educational space and office floor space will promote the creation of jobs, services, facilities and economic activity will act as a catalyst for future growth and change in the locale in accordance with (D9;C;2;e).

215. With the imposition of conditions, no adverse effects have been identified on the operation of London's aviation navigation and the proposals have also been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

Environmental Impact

216. In regard to D9 C (3; a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions and would not compromise the comfort and enjoyment of the public realm at ground floor level. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report. It is considered the proposal would meet the environmental considerations of Policy D9 C (3).

Public Access

217. The policy states that publicly accessible space should be incorporated into tall buildings, where appropriate, particularly more prominent tall buildings where they should normally be at the top of the building. In this instance, given the context of the Reasons for Refusal of the previous scheme, officers consider that the provision of an elevated viewing gallery would not be appropriate in this location. Instead, the proposal would turn over significant areas of the lower levels of the site to a wider demographic.

218. Heneage Arcade would be a new public thoroughfare positioned such as to re-open a lost historic street; portions of Holland House, at the lower and upper levels, would be dedicated to educational, cultural and community spaces. These spaces would be accessible and free of charge to the public for 81 hours per week with 67.75 hours per week free of charge use, despite being free of charge, officers believe this satisfies the intent of the policy, the necessity to book space within

these uses is appropriate given the nature, function and use type of the publicly accessible space. Access would be provided via the historic entrances to Holland House and the new lobby off the Heneage Arcade with legible portals to each of the relevant uses. As such, the provision of publicly accessible uses in the development would be in accordance with D9 D.

Tall Building, Principle, Conclusion:

219. Overall, Officers considered the site to be acceptable for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, C and D, Local Plan policies CS7 (1,2 and 4-7) and CS 14 (1 and 4), draft City Plan 2040 S12 and S21.

220. It is recognised that, due to the proposal's location within the Creechurch Conservation Area, there would be a conflict with CS7 (3), CS 14 (2) and therefore London Plan D9 (B). This conflict with Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Architecture, Urban Design and Public Realm

221. The proposal would be a distinguished and sophisticated addition to the City Cluster. It would have excellent sustainability credentials, be aesthetically pleasing and enhance the public realm in and around the site. The proposals would positively transform the wider area. Providing new, active ground floor uses and pedestrian routes, the proposed building would stitch into the fabric of the surrounding urban grain, complementing the local neighbourhood. Visually, the existing building (31 Bury Street) is tired, and has limited architectural value, its replacement would improve its function and appearance. The Grade II* listed Holland House would also be altered, with judicious roof level additions to increase the height by several floors, and similar alterations to its neighbour Renown House, there would also be alterations to the facades, entrances and interiors.

222. The scheme would provide best in class office floor space, a new retail arcade, a pocket park, publicly accessible spaces and uses within the building, including a rehearsal space at 1st floor level and high-quality shower, changing and cycle facilities to encourage active travel.

223. The Grade II* Listed Holland House would be opened up to a much wider demographic through the provision of cultural and community uses, the proposals

would deliver a campus of civic facilities. These uses would provide space for community groups, schools, faith groups, community workspace, rehearsal and events space, sports facilities and accommodation for SME's. This broader demographic would be able to see its exceptional and vibrant interiors, accessible through a 'heritage lobby' from the proposed retail arcade. A new, attractive roofscape to Holland House would replace the unsympathetic 1960s and 1980s alterations, in addition, works to upgrade the fire safety and accessibility credentials of the building, with further works to the façade of the building and restoration of the historic fabric, would dramatically improve the function and condition of the Grade II* listed building.

224. Renown House would undergo several changes, it would have an additional 2 storeys, designed and modelled in a sensitive manner to continue the appearance of the façade below, the extension would read as a sympathetic addition to the local townscape, the height and mass of this extension would positively rationalise the building heights of its mid-height neighbours. Between Renown House and the proposed tower on 31 Bury Street, a small pocket park referred to as, "St James' Court", would have an outdoor climbing wall on the façade of the building, a dramatic, unique and playful moment in the City of London, bringing sport and activity to the heart of the cluster.

225. The proposals would offer far more to the surrounding area than the existing buildings, and would positively contribute to an active and vibrant City Cluster. The proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth the Central Activities Zone, providing employment and complementary commercial, cultural and community uses. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-3,5,6: growth which is socially, economically and environmentally inclusive. The proposal is at the heart of the strategic function of the City Cluster, to accommodate substantial growth in accordance with Local Plan Policies CS7 and London Plan Policies SD4, SD5 and E1.

226. The proposed development would provide 1.5% of the projected demand for office floor space in the City, and the proposals sought to optimise this delivery in a Plan-led approach which seeks to accommodate growth within the City Cluster. This long-term approach has created an evolving character and context of tall buildings, to which the proposal has been designed to respond. The GLA acknowledge the intensification of office floorspace would support the function of the Central Activities Zone and London's position as a World City, and the proposals are supported in land use terms. The GLA also acknowledge the location of the site in the City of London Eastern Cluster as a suitable location for tall buildings, and that the proposal represents high quality architecture, despite

some concerns with impacts on heritage assets and the design of the ground floor of the building.

227. The proposal would accord with the design-led approach of London Plan Policies D3, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 and Draft City Plan Policy S8. Various alternatives have been explored, including the 2020 refusal, and iterations of the height, massing and façade treatment have been explored by the applicants with planning officers.

228. The site is part of a dynamic, dense urban townscape, fundamentally characterised by its proximity to other tall buildings, conservations areas and listed buildings, as well as being a pivotal site central to several pedestrian routes connecting key landmarks and destinations across the Square Mile. The site is towards the eastern edge of the cluster with numerous completed tall buildings in the vicinity including the Leadenhall Building (No. 122 Leadenhall Street), 22 Bishopsgate, 6-8 Bishopsgate, 100 Bishopsgate, 40 Leadenhall Street, Bevis Marks House, 70 St Mary Axe and 115-123 Houndsditch. These large and tall modern commercial buildings are contrasted with characterful pockets of historic townscape: the defining 'genius loci' ('spirit of the place') of the Cluster. This contrast gives the City Cluster a charisma which is unique.

229. The immediate historic townscape includes the Grade II* listed Holland House (on site), Bevis Marks Synagogue (Grade I) and 38 St Mary Axe (Grade II) sit to the north and northwest respectively. The Leadenhall Street Church of Katherine Cree (Grade I) and 2-16 Creechurch Lane (Grade II) are to the south, The site is within the Creechurch Conservation Area, further afield, the St Helen's Place Conservation Area, the Lloyds Avenue Conservation Area are in the wider vicinity. To the west, 30 St Mary Axe (a non-designated heritage asset), by Foster and Partners, is an example of an early 21st century office building of the highest architectural quality. The proposal would be consistent with the character of striking juxtapositions of old and new, it would be a new addition to and an extension of this character.

Comparison with the previous application (20/00848/FULEIA)

230. The previous application for a similar tall building on the site was refused in 2022, the proposals represent a new design approach for the site, but include a similar yet smaller tower, this application also brings in the adjacent buildings into the application, Renown House and Holland House. Architecturally, the facades of the tower are similar to the previously refused proposals, although the height and

massing has been reduced. The proposal must be considered on its own merits, however regard must be had to the previous decision and to the principle of consistency in decision making.

231. The previously refused scheme was ground plus 48 storeys and 197.94m+AOD while the proposed is ground plus 43 storeys and 178.7m+AOD. Both schemes take the approach of a rectilinear block with a slender tower element towards the south of the site, and a 'backpack' of mass at mid height towards the north of the site; the previous proposal's massing stepped once in the middle of the building, it was made of two rectangular forms. The current application steps back and chamfers at the top of the building, thinning out the tower towards the top on the northeast corner. Towards the middle, the proposals has a similar, but slightly lower rectangular block.

232. Both the previous and the current proposal have a similar architectural approach for the tower, a largely solid facade with strong horizontal and vertical elements, the façade would be made up of a combination of light and dark blue terracotta; the approach is broadly very similar, though with small yet crucial differences in emphasis. The previous proposal was more emphatically vertical, whereas the current proposal has more accentuated horizontal elements which is considered to assist with softening its presence in views of the World Heritage Site.

233. Both applications have a similar approach at ground floor level (although the previous application only included 31 Bury Street within the application boundary), by creating a pedestrian arcade through the centre of the building, lined with active uses. As previously discussed in the paragraphs above, the current application would include Renown House and Holland House, and a new 'heritage lobby' positioned on the pedestrian route through 31 Bury Street would be provided, there would be significant positive alterations, making the buildings more outward facing and inviting members of the public, a key distinction between the two applications and a benefit to the wider area. Holland House is Grade II* listed, and Renown House is a non-designated heritage asset, the impacts on these heritage assets is explained in more detail later in the report.

234. Holland House would have additional floors added to the top of the building, each additional floor would consequentially set back from Bury Street towards the centre of the block, this would replace the existing unsympathetic rooftop extensions, architecturally designed to be recessive to the architecture of the GII* listed façade. Furthermore repairs to the existing listed facades, restorations of the historic interiors, alterations to party walls and internal core alterations would be required to upgrade the building and integrate it into the wider development site. Renown House would also have additional storeys and a new contemporary mansard roof, in addition to other minor façade works and internal alterations

which would help facilitate the delivery of office floor space and cultural spaces within the respective buildings. In addition, the provision of the outdoor climbing wall in the James' Court public space is a new aspect of the proposals. Overall, the proposals would deliver a development which is mixed use, offering social and economically inclusivity to the wider area. . It is the view of officers that, as a result of the differences identified in this report, the current scheme can be distinguished from the previously refused scheme, and from the reasons which lay behind that previous decision.

Architecture

235. The proposed architecture distinguishes itself through a thoughtful and contextual articulation of base, middle and upper sections, delivering a coherent, well-proportioned building with a strong overall sense of architectural integrity. The modelling, detailing and materials are accomplished, resulting in architecture of the highest quality as befitting the City skyline. On a challenging site it works successfully at various scales and is designed to read as three elements – the ground floor public levels, a mid-section block and a slender tower above.

236. The proposed height and massing is consistent with the long-term evolution of the City Cluster, which has sought to influence development so that a considered, coherent overall shape and composition to the skyline presence of tall buildings is achieved. The height of the proposed development has been reduced such that, compared to the previously refused application on the site, the proposal would now read unmistakably as an edge instead of more central component of the Cluster.

237. It would be a clear continuation of the macro-level stepping down of the cluster towards the east, the site would act as a mediator between the lower rise context to the east and the City skyline to the west. In the baseline scenario, the proposed building would loosely follow the existing silhouette of 110 Bishopsgate (the Heron Tower), although it would appear taller in views from the southeast, the additional height would pop up to a limited degree in views from the Southbank and Tower Bridge, although not to an extent which is unusual for the cluster. In the cumulative scenario, the tower at 31 Bury Street would play an important role in the mediating between cluster and the lower buildings to the east, particularly when compared to 100 Leadenhall and 1 Undershaft, consultees have raised concerns and/or objected to the proposals based on its height and its relationship to its context, this is discussed in more detail in the views and heritage section of the report. It is the view of officers that the proposed tower would contribute to the composition of the Cluster in providing an important graduation against its neighbouring group of tall buildings.

238. The height of the proposed building would complement and highlight the City skyline in strategic and distant views, maintaining an iconic townscape character for London. Rounding off this Cluster at its edges is essential to reinforcing the familiar pattern of buildings stepping up towards the centre, making the Cluster a distinct and striking feature of the City's skyline.

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

240. Above the ground floor, the architectural treatment of the proposed building comprises a series of pale blue faience bays with scalloped, ribbed spandrels, set between smooth columns and mullions which would create refined articulation across the façades. The sides of the rectangular window openings would incorporate vertical natural ventilation louvres, successfully integrating sustainable passive ventilation systems, with a 40% solid to glass ratio, to minimise solar heat gains. The pale blue hue of the faience has been selected to sympathise with, but be distinct from, the hues of other tall buildings within the City Cluster, ensuring that in views of the Tower of London World Heritage Site, the proposed building is identified as a sophisticated new addition to the Cluster. Specifically, the colour was selected to appear distinct from the buff masonry of the World Heritage Site and is considered to be a more neutral edge to the Cluster than the darker 110 Bishopsgate building.

241. At the uppermost floor levels, the double order at mid-level would recur across the uppermost office floors, this change in height of the fenestration occurs from when the massing steps inward and the tower becomes slenderer. Above these, the three-storey plant room is housed in a triple order echoing that of the ground floor but executed to a simpler pattern, a successful visual termination of the design. The mirroring and echoing of these architectural devices give the overall architectural design a cohesion which would further distinguish it on the skyline and in the local townscape. The parapets of both the mid-level 'shoulder' and the top of the building are subtly broken by the columns terminating above them to add further architectural modelling and interest. The location of plant and greening in the uppermost three storeys will cause minimal light spillage and appear restrained when seen in conjunction with the World Heritage Site.

242. From the first-floor level to the twenty-second-floor level, the massing largely follows the footprint of the building Bury House. At the twenty-second floor level there would be an external terrace. From the twenty second floor to the thirty fifth floor, the area above this northwestern terrace, the building would step back, the tower would step back again at level thirty seven. Additional terraces would be

provided at level thirty six and forty one. The provision of these terraces contributes to the provision of high quality office floor space, and the massing has been sculpted in an integral and organic architectural manner whilst responding to strategic views of the Tower of London and other sensitive views.

243. The tower base would take the form of a ‘triple order’ of faience columns wrapping around the building from the south-west to the north-east, rooted in a granite plinth and rising to a strong cornice line which would be a focal point for further public artwork. This ‘triple order’ device builds upon architectural precedent elsewhere in the locality and would relate the building appropriately to its townscape. The faience of these areas would be executed in a darker blue hue to further differentiate them from the upper storeys. Their colour tone, materiality and modelling would ensure the proposed building relates appropriately to its local setting at street level; the Creechurch locality here is characterised by a number of unlisted brick and terracotta historic buildings and the sophisticated faience of the grade II* listed Holland House.

244. Holland House would be extended at roof level to provide additional accommodation within the building, this would replace the indifferent 1960s, low quality rooftop additions. Attractively modelled, finished in faience, these upper layers would read as a lightweight top when seen in glimpsed views from the southside of Gherkin Plaza. This rooftop extension would be setback from the main, western façade, respecting the primacy of the ordered yet decorative main façade, and would be scarcely visible in the original, oblique views of this façade along Bury Street. Façade repairs to the listed building would maintain the historic façade and internal alterations would integrate the building with the wider development, allowing the building to accommodate public uses which contribute positively to the surrounding area.

245. Renown House would also be extended, it would have additional floors on top, and a new contemporary mansard, with the new facades following the architectural treatment of the existing façade below, the fenestration and materials would match the existing condition. This extension would create a more uniform approach to this city block, bringing the building heights closer together in a more coherent manner. There would also be internal alterations to combine Holland House and Renown House, as part of providing the mix of uses which would contribute to the wider positivity of the development.

246. The alterations to Holland House and Renown House are discussed in more detail in the heritage section of the report.

Active Uses and Ground Floor Public Realm

247. The proposed development would transform the site into a vibrant hub for the community, with a focus on public access, vibrancy and connectivity. At the heart of the scheme is the creation of inviting and engaging publicly accessible spaces at the base and lower floors of the buildings, both on the pedestrian route through the tower, 'Heneage Place', and Holland House and Renown House, offering opportunities for community use, sport, learning and education that appeal to Londoners and visitors alike. Additionally, the development would offer flexibility to workspaces and cultural areas and reimagined and new public realm, situated within the historic interiors of Holland House. The provision of these new publicly accessible areas would add a variety of activity to the centre of the cluster, the proposals would deliver a more dynamic and varied offer of uses to its surroundings.

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

249. Despite the relatively small site footprint, the proposed building would provide 619 sqm of new external public realm at ground floor level as compared with the existing 352 sqm. The chief feature would be a new public pedestrian route running north-south, 'Heneage Place' which would reinstate the lost south-western end of Heneage Lane. The 'Heneage Arcade' would be generous in scale, paved in York stone to blend seamlessly into the City's existing public realm. The generous scale will draw the eye and attract the public from numerous vantages. The ceiling soffit would be eye-catching with a sense of rhythm created by the architectural 'ribs' that would further draw pedestrians through. The arcade would draw inspiration from the established tradition of covered walkways elsewhere in London and would be flanked internally by retail units, to create a new mixed-use arcade destination for the locality and the wider City, this would be complemented by a rear access point to the cultural and community uses hosted within Holland House. It would significantly raise the quantum of active frontages, making a strong contribution to the local vibrancy of the area and providing shelter in inclement weather and during hot summer days.

250. GLA officers have argued that the arcade should be opened up, to create an open colonnade through the area, City officers believe the applicant's vision for the route is the most appropriate for the site's context, it follows a key characteristic of the City's public realm where narrow streets and alleys stitch together routes and public spaces. An open colonnade with a cantilevered space is not considered by officers to be an appropriate design solution for this area. The

London Review Panel and the GLA have suggested this route should be open 24 hours a day and be publicly accessible, the hours of operation of the route would be 7am-11pm.

251. A public realm management plan will be secured through the s106, to agreement the maintenance and management of the public space and the rules governing it, with the intent to maximise public access and limit rules governing the space insofar as reasonably possible.

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

253. At the southern exit of Heneage Arcade, the existing, rather drab open space between 31 Bury Street and Holland House would be reimagined as a pocket park, 'James' Court'. This would help to increase the area of public realm at the heart of the dense Cluster, opening up the entire ground floor plane on the south-west part of the site to pedestrians, as well as, creating a new amenity space for people in the locality. It would host the theatrical climbing wall, hanging above the space, adding visual interest to the area, encouraging physical exercise by being visibly on display, a unique offer to the cluster which is likely to appeal to a wide demographic. The new James' Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane, gentle environment conducive to public use.

Optimising Active Travel

254. The proposals would have an impact on the appearance and function of Creechurch Lane and Bury Street, the development would generate pedestrian footfall in particular, as addressed in the Transport section of this report and Strategic Transport Report. Cycle movement is also expected to increase in the vicinity of the site. There would be an impact on the townscape and heritage assets, as well as some microclimatic impacts.

255. The execution of highway works would be provided for in a s278 Highways Act 1980 agreement, secured through the s106, which would include works on Creechurch Lane and Bury Street to mitigate these impacts, in accordance with Policy VT1 of the Draft City Plan 2040 and T4 of the London Plan 2021. This s278 agreement would include alterations to the physical infrastructure on the street, including alterations to the pavement kerb lines and upgrading the surface materials to York stone for the footways and granite setts for the carriageway in accordance with the CoL technical palette of materials.

256. These interventions would represent an improvement to the environment for pedestrians, both in terms of its functional design and visual amenity, the existing pavement and surfaces are in poor condition. Creechurch Lane and Bury Street currently below the standards of neighbouring streets, the paving materials are inconsistent and low quality, and the carriageway prioritises vehicles over pedestrians, in an area where vehicle movement volumes are low. The immediate vicinity of the site has active ground floor uses, including pubs and restaurants, upgrading the physical infrastructure of the street will improve the attractiveness of the streetscape. The City Cluster Vision 2019 identifies this area and the proposed enhancements are broadly in accordance with what's set out in the strategy, these works are considered to be a benefit of the scheme which would mitigate the impact of the development and enhance the surrounding area. Furthermore, the proposed 'City Cycles' facility in the basement of the building would provide maintenance and repairs services for those who cycle, encouraging active travel through enhancing convenience and amenity for user.

Public Access

257. Publicly accessible space would also be created within the building. As well as the north-south entrances to Heneage Arcade, the middle bay of the proposed building's Creechurch Place elevation would incorporate a focal entrance aligned on Mitre Street which would lead directly to the main office entrance for accessing the upper floors.

258. The Creechurch Place entrance would also provide access, via staircase and lifts, to the 'Creechurch Hall', a series of new publicly accessible intended to be analogous to a village hall or community centre. It would provide a bookable, inclusive and free for all new space for public use, targeted at individuals, community groups and other organisations from the locality and beyond, including from those more economically disadvantaged areas around the City fringe. The space has the potential to serve a rich, diverse community from all backgrounds

in a socially and economically inclusive manner. Access from the ground floor would connect to lifts and the ground floor of Holland House and Renown House, from these areas people can take the stairs or lifts to the other spaces and uses across the proposed tower or through the internal circulation of Holland and Renown House. At first floor level, within the tower of Holland House, a large auditorium would provide capacity to host events, furthermore, the lower ground floor level would also complement the ground floor offer. The provision of community uses would be a significant provision to the locality and the wider City.

259. The elevations to lower floors of the tower would be treated differently from the rest of the building to reflect and celebrate their public status, particularly Heneage Place, other public uses would largely be located within the GII* listed Holland House, boosting its appeal as a destination. Overall, the proposals would integrate unique civic experiential offerings in support of the City's wider 'Destination City' initiative, providing a rich mix of public uses which would enliven the City Cluster as a vibrant, 24/7 destination. The people-focussed lower floors of all buildings within the application boundary and the varied cultural offer throughout the base of the building would create a rich tapestry of uses and activities, in accordance with London Plan policy D3, Local Plan policies CS10, DM10.1, DM10.3 and emerging City Plan 2040 S8.

Delivering Good Design and Design Scrutiny

260. Officers consider that the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture and Urban Design section of the report, it is also covered in the comparison with the previously refused application.

261. With regard to D4 B, the pre-application process including formal meetings, workshops using digital and physical visual tools, and site visits as part of the design analysis and interrogation to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

262. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. Transport data has informed options and evidence for the provision of transport related infrastructure. Environmental microclimate, daylight and sunlight analysis informed the massing

and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report. Part D4 C has been met and a detailed design and access statement has been submitted.

263. In respect of D4 D, the proposals have been to the London Review Panel, they have undergone a rigorous local borough process of design scrutiny as required by the policy. In addition, the applicants undertook preapplication engagement with a variety of stakeholders, including the GLA, Historic Royal Palaces, Historic England and others. The design and access statement sets out how the scheme has changed and evolved as a result of officer and stakeholder feedback, showing the evolution of the scheme and the 'moves' taken to respond to comments.

264. In relation to D4 E, parts 1-6, there has been a City level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above. In addition, the applicants brought the scheme to the London Review Panel which was attended by experts from different disciplines, these comments were mindful of the policy context and clearly set out recommendations. The London Review Panel set out several recommendations which have been considered by the design team. City of London officers views on topics which the LRP comments have been set out elsewhere in the architecture, heritage and views section of this report.

265. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard.

266. Overall, the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design.

Amenity Space and Terraces

267. The amenity terraces have been designed with adopted policy DM 10.3, and draft policy DE4 in mind, utilising the form of the building and integrated in its mass, would avoid any adverse impacts on identified views.

268. On the Bury House Tower at twenty-second floor level there would be a large external terrace, additional terraces would be provided at level thirty six and forty

one. The provision of these terraces contributes to the provision of high quality office floor space, and they have been designed as a distinct but fully integrated aspect of the building. These terraces would help to provide best in class office accommodation by providing amenity and break out space for the office occupants. Planting would be provided on these areas, to provide biodiversity and well-being benefits. They would have a negligible impact on long range views, small amounts of potential greening would provide visual interest at a high level where it is visible.

269. On the upper levels of the roofscape of Holland House, there would be terraces which provide amenity to the office occupants and the potential cultural partners of the building. These terraces would have limited visual impact, at range, balustrades would barely be perceptible, closer to the building they would be set back from the façade line of the building limiting visibility from street level. Where visible, viewers would see the balustrades, planting and landscaping. The planting would provide privacy, screening from overlooking and visual amenity, whilst providing a pleasant environment for the occupants.

270. The provision of the Urban Farm on the 9th floor level would accompany the proposed cultural and community spaces, it would facilitate a small amount of food production but would chiefly be used for educational purposes and partnerships with relevant organisations. This terraced area would further enhance the amount of green infrastructure, offering biodiversity gains and re-connecting people with the green environment.

Servicing, Plant Equipment and Integration into the Design

271. Facade maintenance and cleaning have been carefully considered. High level access from the main roof and intermediate terraces would be via permanently installed Building Maintenance Units (BMU). BMUs would be located at roof level. When not in use, the BMUs would be parked inboard and would not be visible. The systems are designed to be visually integrated into the architectural form when non-operational. Mechanical and electrical plant rooms would be distributed throughout the building and at the uppermost levels of the Bury St tower, largely concealed from view, where they do appear, they would be visually integrated into the facade design. The main plant levels would be located in the basement and on the upper levels of the tower. This is in accordance with Local Plan Policy DM10.1 (bullet 7) and Draft Policy S8(21).

Lighting

272. Lighting, in accordance with the City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be secured via condition. 125. Overall, the proposed building is considered to harmonise with the principles of paragraph 130 of the NPPF in that it is a building which is sustainable and beautiful, being a well-designed proposal which would enhance the City's architectural character and would be sympathetic to the character of the locality, function well and add to the overall quality of the area.

Conclusion on Architecture:

273. Overall, the architectural credentials of the proposed development would be excellent. It follows the best practice principles of urban design, combining office, public and cultural uses within a well considered built form, it would be finished in high quality materials. The design throughout integrates public amenities and cultural uses, befitting the pivotal on the edge of the City Cluster. Above all, a strong and compelling civic quality would be woven throughout the proposal. The proposals would not comply with policy CS14.2 of the Local Plan for the reasons set out in the above paragraphs, however the proposals would accord with London Plan policies D3, D4, D5, D8 and GG1-6, City Plan (2015) policies CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, CS16 and DM16.2, and Draft City Plan 2040 policies HL1, S8, DE1, DE2, DE3, DE4, DE8, AT1, the relevant NPPF design policies and National Design Guide.

274. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site's interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

Strategic Views and Heritage

Tower of London World Heritage Site

OUV and Relationship to Setting

275. The impact of the proposal on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: (i) an internationally famous monument, (ii) landmark siting, (iii) symbol of Norman power and (iv) physical dominance (of the White Tower); and, to a lesser extent, (v) concentric defences, (vi) surviving medieval remains and (vii) physical (historical) associative evidence.

276. Whilst the Tower of London comprises a scheduled ancient monument, various listed buildings and is within a conservation area (in the LB Tower Hamlets), it is considered proportionate and robust to consider the impact on OUV in order to draw a conclusion on the impact on these heritage assets.

277. The WHS Management Plan establishes a 'Local Setting', 'Immediate Setting' and non-spatially defined 'Wider Setting'; the proposal site is within the latter. The Local Setting Study (LSS) identifies those most representative views and/or viewing areas to and from the Tower of London which are deemed to exemplify the OUV and their components, with management guidance providing a baseline for assessing change. These representative views/viewpoints overlap with some LVMF viewing locations and these are assessed together here.

278. Importantly, the WHS Management Plan acknowledges the City Cluster as signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. Here is important recognition that the Cluster has an emerging, distinct identity and the relationship between the Tower and the Cluster is long-established, having existed for over half a century, forming a backdrop to many views of the Tower such as from within the Inner Ward.

279. In recognising the place of the Cluster in the Wider Setting, the Management Plan acknowledges (at para 7.3.18) that it will intensify as a distinct and separate element to the Tower. At para 7.3.27 it states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider

(i) their effect on the established Cluster, (ii) the space between it an the Tower, and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

280. The intervisibility between the royal Tower and the commercial City, over which it was intended to command and defend from the river approach, is an integral part of the attributes (i) to (v) of OUV outlined above. Both the Tower and the City are ancient entities with a rich ceremonial life accrued through hundreds of years of existence, giving them a unique sense of place both central to and yet set apart from modern London. In the case of the City, that original commercial purpose remains and contributes to a relationship between the two entities that is nearly one thousand years old and therefore of unique interest.

281. The impact assessment set out below uses the assessment framework in the Mayor's London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS guidance.

Impact on OUV/Significance

282. The proposal would have an indirect impact on the WHS, via change in its Wider Setting.

Objections

283. As set out in the Consultation section of the report, above, Historic England have objected to the impact of the proposals on the World Heritage Site, specifically in views from Tower Bridge (North Bastion and dynamic journey) and the Inner Ward. Others have objected to the Tower Bridge impact, including the GLA, Historic Royal Palaces, London Borough of Tower Hamlets and others. Historic Royal Palaces share the concerns about the proposal's impact on the Inner Ward and have concerns about its presence in views from other places. In coming to a view on these matters, officers have given these representations from expert stakeholders substantial weight; however, as set out in subsequent paragraphs below, officers reach a different conclusion on the impact of the proposal on the WHS.

Tower Bridge (10A.1)

284. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge). The view is of particular importance in appreciating the 'Internationally Famous Monument' and 'Landmark Siting' attributes of OUV.

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

286. In the foreground of this view, the Tower of London WHS forms an important visual centre of gravity, with its legible and consistent stretch of historic townscape and iconic silhouette of the White Tower. Due to the elevation of the viewing point and the topography of the City, the area of the WHS west of the White Tower does not form a historic skyline because the modern City is seen immediately behind it as a backdrop; in this area of the view the towers of the Cluster form a distinctive modern skyline.

287. Immediately adjacent in the view, and with visual separation between them, the White Tower and the eastern half of the WHS are seen against sky and so form a historic skyline. Much of the drama and interest of this view derives from this powerful contrast between the modern skyline of the City and the historic skyline of the White Tower and eastern half of the WHS immediately adjacent to one another. Indeed, the SPG implicitly acknowledges this by describing how the evolving Cluster 'will add considerably to the character and stature of the view' (para 187).

288. Historic England, Historic Royal Palaces and others have objected to the impact of the proposal on the OUV of the WHS in this view. Historic England claim that the proposal would create a 'cliff edge' that would present 'a greater distraction' in the view, in addition to making the Cluster 'increasingly overbearing overall.' This sentiment is broadly echoed by the other objectors.

289. Seen from here, the proposal would appear at the eastern edge of the Cluster, between the historic and modern skylines described above, providing an eastern endpiece to the baseline and cumulative Cluster form. The proposed building would be visible between 30 St Mary Axe (the Gherkin) and the White Tower against the backdrop of Heron Tower and Heron Plaza, which it would partially occlude.

290. The proposal would take the form of a pale blue faience tower massed in three stages: broadest at its base where it would mirror the existing silhouette of Heron Plaza, then slenderer in its middle section, as it rises upwards to maintain the sky gap between Heron Plaza and the White Tower, and slenderest in its topmost stage where it would step deferentially back from the WHS towards the Cluster. Rising to approximately the height of the Gherkin, the proposal would occupy a small area of clear sky space near the White Tower, though it would maintain visual separation between the Cluster and the WHS.

291. The baseline and consented (cumulative) Cluster of towers steps downwards from the centre at 22 Bishopsgate (and 1 Undershaft in the cumulative) in a deferential manner towards the WHS. This profile has been carefully negotiated through numerous planning decisions to mediate between the Cluster and the WHS. Under both baseline and cumulative scenarios, the height and stepped form of the proposal are considered to create a successful terminus to the Cluster when seen from this viewpoint and would be consistent with the long-term Cluster curation described above.

292. The LVMF SPG (para 186) seeks to maintain ‘some’ visual separation between the upper parts of the White Tower and the Cluster; the guidance in the Local Setting Study (LSS) for this view seeks to ensure that ‘buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point’.

293. Although it would create, particularly in its middle section, a vertical edge or frame near the silhouette of the White Tower, this is not considered to challenge the iconic qualities of this silhouette or the gravitas of the WHS as a whole. The second stage of the proposal would rise approximately to the level of the weathervane of the south-west turret, below the terminus of the finial. At this point the proposal would step deferentially back towards the Cluster; though it would clearly be a new, taller element of mass in the background, it is considered that its profile would be sufficiently deferential so as not to dominate the White Tower or diminish its perceived scale by drawing that of the centre of the Cluster too close.

294. As such, the proposal is considered to successfully address the Reason for Refusal of the preceding scheme on this application site, which related specifically to this view. The refused scheme was considered to cause harm through its height, strong vertical form and proximity, which departed from the long-term curation of

the Cluster referenced above. In particular, it introduced a vertical edge adjacent to the White Tower that rose significantly higher than the Gherkin, drawing the overall scale of the Cluster much closer to the WHS. Whilst the proximity would remain the same with this revised proposal, the vertical edge or frame it would present to the White Tower would be considerably lower and crucially broken by the deferential step backwards of its topmost stage towards the Cluster, ensuring the proposal would be of a subsidiary scale commensurate with its position as an edge, rather than a central, component of the Cluster, and thereby consistent with its long-term curation. Moreover, the architectural approach for the current proposal has been crucially nuanced by introducing more accentuated horizontals, which help to further downplay the tower's verticality.

295. Furthermore, while the proposal would be visually proximate to the White Tower, it would clearly be physically distant and therefore clearly disassociated from, the WHS. The proposal would be read as a clear endpiece to a group of modern towers located at the centre of the Cluster some 500m away. In this, assisted by its horizontal emphasis and blue hues of its faience echoing the colouration and appearance of other Cluster buildings, it would be comfortably disassociated from the WHS, which would remain clearly legible and appreciable by the viewer. The WHS would be the closer and would remain the dominant of the two entities in this view.

296. For the aforementioned reasons, the proposal would, under baseline and cumulative scenarios, preserve the ability to appreciate the WHS as an internationally famous monument, that sense of its landmark siting in relation to the City and the physical dominance of the White Tower, the attributes of OUV that are particularly captured by this view. It would not 'dominate' the WHS, would not directly interact with the protected silhouette of the White Tower and would maintain visual separation between it and the Cluster, all in accordance with paras 183 and 186 of the LVMF SPG. The proposal would relate appropriately to existing skyline features and, in the way it would consolidate and 'complete' the eastern edge of the Cluster when seen from here, would support the Cluster's contribution to the character and stature of the view, in line with para 187 of the SPG.

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

Dynamic Journey across Tower Bridge

298. Historic England and Historic Royal Palaces have raised concerns about the impact of the proposed building in the sequence of views of the WHS as one proceeds northwards over Tower Bridge, approaching the WHS, and onto the northern bridge approach. Historic England are considered that the proposal would 'leave less of the kinetic experience unimpacted… consequently the Tower would appear less apart from the City and its silhouette.'

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

300. Viewpoints corresponding to this experience have been assessed in the submitted application. Moving north, from the south end of Tower Bridge to the North Bastion, the proposal would appear as an eastern endpiece to the City Cluster which gradually draws closer to the WHS as one moves over the bridge. At the North Bastion, the proposal (and the Cluster) would appear as described in the section on 10A.1 above; beyond the North Bastion and onto the northern bridge approach, the proposal would continue to appear as part of the City Cluster which at this point in the journey has appeared behind the WHS.

301. Throughout this journey, the Cluster forms a long-established background presence that gradually draws closer to, then is seen (from the North Bastion) in poised juxtaposition with, and then gradually draws behind and moves beyond, the WHS. The proposal would be at its most prominent when seen from the North Bastion, as discussed at length in the paragraphs above; the juxtaposition between the two entities is at its acutest there. For the rest of the journey, the proposal would read as a comparatively modest (in respect of overall height) addition to the Cluster that would consolidate further and be well integrated with it; particularly on the northern end of the journey where, due to the lines of sight, the proposal would cease to read as the Cluster's eastern edge and would instead become more 'merged' with the existing buildings in the field of view.

302. As with the specific viewpoint on the North Bastion, officers strongly consider that, throughout this dynamic journey, the viewer is always conscious of the fact that the WHS and the Cluster are two entities, historic and contemporary, that are physically separated by a considerable portion of low-rise townscape, including the Local Setting area, and as such visually separated in most of the viewing experiences, including from Queen's Walk and much of the Tower Bridge

experience. Much of the drama and interest in this journey derives from the way in which the WHS remains the commanding focal point but is contrasted with, and set off by, the presence of the modern Cluster which underscores and enhances that ancient and overarching relationship between Tower and City.

303. Officers strongly consider that, having reached the northern bridge approach where the proposal and the wider Cluster has fallen in behind the WHS, the viewer is in no doubt that this is because the lines of sight, not the fundamental balance of this relationship, have changed; in moving across the bridge, the viewer has had ample opportunity in which to appreciate each of these entities on their own terms, as a contrasting pair, and the clear physical and varying amounts of visual separation which exists between them.

304. As such, in baseline and cumulative scenarios, officers consider that the proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan and Local Setting Study.

Queen's Walk (25A.1-3)

305. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is Representative View 10 in the LSS.

306. In this viewing experience, the WHS is the dominant centre of gravity and visual focus, with its sky-etched, iconic silhouette clearly recognisable and standout from all other surrounding features. Accordingly, a Protected Vista from 25A.1 focuses on axis with the White Tower, which also benefits from a dynamically protected sky silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF SPG recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413).

307. In this viewing experience, the proposal would appear at a significant distance away from the WHS, at the eastern edge of the Cluster in both baseline and cumulative scenarios. At no point in the viewing experience – from the Assessment Points or between them – would the proposal appear near the White Tower and only in the most easterly viewpoint (25A.3) would it appear behind the westernmost curtain walls of the WHS – but the impact here would be minimal,

given the existing modern buildings which already form a backdrop to this area of the WHS.

308. The observer would continue to recognise and appreciate the WHS as the Strategically Important Landmark, set apart from the City and not lost in it; the proposal would preserve the long-established dynamic between the WHS and the consolidating Cluster as two distinct, juxtaposed urban forms. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the view, all in accordance with the LVMF SPG (paras 414-5 and 418-422) and LSS guidance.

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

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

310. This view is also identified as important in the WHS Management Plan and the LSS (Representative Viewpoint 11). The WHS is identified as the sole Strategically Important Landmark whilst Tower Bridge and HMS Belfast are identified as other landmarks. The rising ground of Greenwich and Canary Wharf are clearly discernible.

311. From both Assessment Points, in baseline and cumulative scenarios, the upper storeys of the proposal would be visible directly east of 20 Fenchurch Street. It would appear as closely integrated amongst, and a further high-quality augmentation and consolidation of, the Cluster. It would appear clearly disassociated from the WHS, which lies to the extreme east of the view.

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

Other WHS views

Inner Ward, Tower Green and Scaffold Site

313. The LSS Inner Ward views are deemed to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. The LSS aims to maintain views illustrating the living tradition of the WHS, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated.

314. Under 'key issues' the LSS states that tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or affect the scale of the enclosing historic buildings. The associated 'Objectives and guidance' stats that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.

315. The LSS acknowledges the Inner Ward to have a range of views, and the submitted application provides a detailed and comprehensive assessment of the visual impact on this place. Being entirely occluded behind the Chapel of St Peter ad Vincula, the proposal would not be visible from the Scaffold Site viewpoint (LSS view 1). It would be visible (along with the existing towers of the Cluster) to varying degrees from other places within the Inner Ward; from the centre, the proposal would appear over the east end of the Chapel, while from the south side, the proposal would be glimpsed above the roof of No. 2 Tower Green. Further forwards toward the Chapel, the proposal would disappear again from view.

316. Historic England have objected to the appearance of the proposal in these views, which they consider would add 'further to the visual intrusion of various tall buildings in the City' and 'further diminish the self-contained ensemble…distracting from the Tower's remarkable sense of place'. This point of view is shared by Historic Royal Palaces and other objectors.

317. In these dynamic viewing experiences from the Inner Ward, in both baseline and cumulative scenarios, the proposal would be seen as part of the varied, eclectic City Cluster, disassociated from the WHS and subject to the aforementioned long-term curation to achieve a balanced and deferential relationship with the WHS. And these Inner Ward views are a kinetic experience, in which the buildings of the WHS are the foremost presence, seen in a variety of

endlessly charming juxtapositions. Occasionally in these views the towers of the Cluster can be seen on the City skyline beyond, but never to such a degree of prominence that upsets the sense of place in the Inner Ward, or the aforementioned juxtapositions between its buildings.

318. Where visible, in both baseline and cumulative scenarios, the proposal would appear as a subsidiary, recessive edge component of the Cluster. Its discreetly elegant architecture would shed rather than draw attention, especially when contrasted against the larger existing forms of the Cluster. As such, the proposal would maintain that balanced, deferential relationship between WHS and the Cluster and the recessive, occasional presence of the latter in the Inner Ward views.

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

320. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner Curtain Wall (S)

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

322. From the identified viewpoints from the south section of the Inner Curtain Wall, looking northwards, the proposal would appear immediately to the east of the Gherkin and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing

Cluster. The height and stepped profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity.

323. With its substantive, rock-built architectural presence, the White Tower would continue to command the foreground of these views, while the WHS's relationship with the river would remain undiluted by the proposal. The LSS recognises that 'modern buildings provide a clear contrast between the historic Tower and contemporary city outside its walls' – an acknowledgement of the concept of the contrast between ancient and modern buildings helping to reinforce one another's presence and contributing to the Landmark Siting attribute of OUV and the component of this which is the established relationship between the WHS and the City beyond.

324. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner Curtain Wall (N)

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

326. From the identified viewpoints from the north section of the Inner Curtain Wall, looking northwards, the proposal would appear immediately to the east of the Gherkin and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing Cluster. The height and stepped profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity. The concentric defences would remain pre-eminent and their appreciation undiluted.

327. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Main Entrance

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

329. In the view from the Main Entrance, the proposed building, appearing to the east of the existing form of 40 Leadenhall Street and slightly lower than it, would consolidate and augment the eastern profile of the Cluster. In the baseline and cumulative scenarios, both the Tower's relationship with the City and Thames and the qualities and pre-eminence of its defensive architecture and their appreciation would remain undiluted.

330. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Other Views

331. In other the views and approaches to the WHS identified in the LSS, the proposal, though visible, appears as a peripheral feature on the skyline some distance from the WHS. The City Cluster has become an integral, long-established part of the setting and views of the WHS and the proposal would be consistent with this. In these other views and approaches, under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Conclusion – Tower of London

332. The proposal would preserve the OUV of the WHS and the ability to recognise and appreciate the WHS as a Strategically Important Landmark and would accord with the visual management guidance in the LVMF SPG.

333. The proposal's relationship with the WHS has drawn strong objections from Historic England, Historic Royal Palaces and others; whilst giving great weight to these representations, officers reach a different conclusion. At the heart of the matter are differences in opinion on the visual resilience of so famous a monument as the Tower and the ability of the average viewer to be capable of discerning between ancient and modern entities in the same field of view, comprehending the visual proximity and physical distance involved, and appreciating them individually and as part of an overall skyline.

334. Perhaps most fundamentally, officers consider that, for all the reasons set out in preceding paragraphs, the evolving City Cluster, and therefore the proposal, is consistent, in principle, with the ancient dynamic between Tower and City which is particularly enshrined in the OUV attribute 'Landmark Siting'. The proposal would appear as a new element of the Cluster, with varying degrees of prominence in the views of the Tower, but officers, for the reasons set out in the preceding paragraphs, do not consider that it would upset the balance of this existing relationship and cause harm to the WHS in the way objectors have claimed.

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

London View Management Framework (LVMF)

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

London Panoramas

337. The application site is not affected by the Protected Vistas designed by the LVMF, which crisscross the capital to protect views of the Strategically Important Landmarks (SILs) which, in the City, are the Tower of London and St Paul's Cathedral. The Protected Vistas impose height ceilings on the areas below them, and the application site does not fall into one of these.

338. However, the proposal's height means that it would be visible to varying degrees in some of the London Panoramas of which these Protected Vistas are part. In Views 1 (Alexandra Palace) and 2 (Parliament Hill), the proposal would be largely occluded behind the existing tall buildings of the Cluster; it would be fully occluded in Views 3 (Kenwood) and 4 (Primrose Hill). From Views 5 (Greenwich Park) and 6 (Blackheath Point) it would be more obvious, but would appear in front of 30 St Mary Axe (the Gherkin) and largely occupying its established silhouette on the skyline, and in so doing leading only to a minor change in the overall shape and hues of the Cluster.

339. The magnitude of change created by the proposal in these Panoramas would be ultimately minor and the proposal would accord with the LVMF SPG by assisting with the consolidation of the City Cluster, which is identified as a landmark in these views, preserving their composition and the viewer's ability to recognise and appreciate the Strategically Important Landmarks.

River Prospects

340. The proposal would be visible in some of the LVMF River Prospects, which unlike the Panoramas discussed above do not have an element of geometrically defined view protection, but instead are to be assessed qualitatively.

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

341. In this famous sequence of views, St Paul's Cathedral is the commanding presence, with the historic townscapes of the Strand, the Temples and the Whitefriars immediately before and to the west of it while, to the east, the existing City Cluster of towers is seen as a dramatic, modern counterpoint to the Cathedral.

342. Seen from the north of the bridge (15B.1), the proposal would appear in the centre of the Cluster, partially occluded by the existing form of 122 Leadenhall Street (the Cheesegrater). It would assist with the consolidation of the Cluster, of which it would clearly read as a part, set away from and disassociated from the Cathedral. As one moves south over the bridge to the centre (15B.2), the proposal would become partly occluded by 1 Leadenhall Court; in the cumulative scenario it would be totally obscured at all points by the consented 100 Leadenhall Street scheme.

343. As such, the proposal would not draw tall buildings closer to St Paul's Cathedral, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paras 264-7 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.

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

344. This viewing experience is similar to that of Waterloo Bridge, except that the lower position on the South Bank allows for more of an appreciation of the historic frontages of the Temples and Whitefriars; the Cathedral is again seen as the commanding presence and with greater sky space between it and the Cluster.

345. As with Waterloo Bridge, the proposal would appear in the centre of the Cluster when seen from here, but largely occluded by 1 Leadenhall Court. In the cumulative scenario it would be totally occluded by that building and the consented scheme at 100 Leadenhall Street. Accordingly, the proposal would preserve the setting of St Paul's Cathedral and that of the identified landmarks in this view, all in accordance with the visual management guidance of paras 280-81, 283 and 57 of the SPG.

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

346. These views are, again, similar to those from Waterloo Bridge which lies further east, except that the overall field of view is greater and the Cathedral is seen as the central presence of a wider urban skyline. Due to the similarities between these views and those from Waterloo Bridge, the impact of the proposal would be

extremely similar to that described in the paragraphs above, but at a greater distance. Accordingly, the proposal would preserve the setting of St Paul's Cathedral and that of the identified landmarks in this view, all in accordance with the visual management guidance of paras 301,302, 304, 305 and 57 of the SPG.

Lambeth Bridge (19A.1)

347. Views downstream from this point includes a glimpse of the City Cluster, seen extremely distantly across South London. The proposal would be very largely occluded by 52 Lime Street (the Scalpel) with a slight portion of its uppermost storeys visible behind; it would be completely occluded in the cumulative scenario. As such there would be not impact on the setting of any Strategically Important Landmark or other identified landmarks in the view.

Conclusion – LVMF

348. The proposal would preserve settings of the Tower of London World Heritage Site and St Paul's Cathedral as the Strategically Important Landmarks and it would preserve the composition and characteristics of all the LVMF views assessed. Lighting will be managed to ensure the development would not command the focus or distract unduly after dark. The proposal would comply with London Plan policy HC4, Local Plan policy CS13 and draft City Plan 2040 policy S13.

Other Strategic Views (Local)

St Paul's Cathedral

349. The proposal is not located within the St Paul's Heights grid, would not be visible and would be out of scope of many of the Viewing Points identified in the Protected Views SPD (fig. 3).

350. It would be visible to minor degrees in the kinetic riparian sequences along the South Bank and from the Thames bridges, where its impact would be as described in the sections above on Waterloo and Hungerford Bridges and Gabriel's Wharf. The proposal would appear between existing Cluster towers or be screened by them and is located on the other side of the Cluster to the Cathedral. It would be a comparatively marginal presence in these views and would not affect the sky space between the Cluster and Cathedral or intrude into its backdrop.

351. The proposal would be concealed by 8 and 22 Bishopsgate and the Cheesegrater in views from Fleet Street and Ludgate Hill and would be almost entirely occluded by the Cheesegrater in views from the Golden gallery of the Cathedral.

352. The Dean and Chapter of St Paul's Cathedral have queried why a fuller assessment of the impact on the Cathedral was not undertaken and the methodology behind scoping in and out certain viewing positions. The scoping exercise is consistent with the position of the site on the eastern side of the Cluster and proportionately reflects the fact that, due to this siting and its height, the proposal has only comparatively minor degrees of visibility in views of the Cathedral. Officers have interrogated this thoroughly using 3D modelling techniques.

353. The proposal would cause no erosion of the setting of the Cathedral and would be consistent with Local Plan policy CS13 (2), draft City Plan 2040 policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

The Monument

354. The proposal site is outside the spatially defined views from the Monument which are protected under Local Plan policy. The proposal would be completely obscured in views from the north of the Monument viewing gallery; it would not be in the Monument's 'Immediate Setting' and would not therefore harm or obstruct important views from afar or locally.

City Landmarks and Skyline Features

355. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features which, in accordance with CS13, should be protected and enhanced. These are addressed individually below:

St Botolph Aldgate

356. As a component of the Cluster's eastern edge, the proposal would be visible in views of this church looking west and there would be intervisibility between the proposal and the brick tower and obelisk spire. The proposal would rise to the base of the spire and form a modern new element behind the church when viewed from Aldgate High Street. This visual relationship would quickly change as the viewer moves westward; moreover, the proposal would clearly be read as part of the modern Cluster seen in the backdrop to the church, rather than appearing overly close or domineering. As such, the church's skyline presence would be preserved.

PLA Building

357. The proposal would be visible in views of the former PLA building, forming part of a backdrop of tall buildings of the Cluster when seen from various points, including the South Bank, Trinity Square and Tower Hill. Officers consider that the proposal would read as an edge component from the Cluster and clearly set apart from the PLA Building and, while visible in relation to it, the proposal would not conflict, compete or detract from the PLA Building's silhouette and its skyline presence would be preserved.

Tower of London

358. The proposal would be visible in views from and of the WHS, which have been discussed in greater detail above. Within these views, it has been found that the visual impact of the proposal would be acceptable and for the reasons set out in the paragraphs above, it is considered that views of this Landmark are considered preserved.

359. The proposal would protect views of relevant City Landmarks and Skyline Features in compliance with CS13 (2) and City Plan policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Elevated Public Spaces

360. The City Cluster forms a key element in a number of views from the elevated public spaces in the Cluster towers. Such areas are increasing in number and are proving to be highly popular and much-visited areas of elevated public realm, offering exceptional pan-London views.

361. In particular, the Cluster forms a dynamic element in views from the Skygarden at 20 Fenchurch Street and the roof terraces at 120 Fenchurch Street and One New Change. The impact of the proposed building has been assessed from these places. Due to its location on the eastern edge of the Cluster, it would be largely hidden by existing tall buildings. As such, the proposal, where visible, would appear as another dynamic addition to the Cluster, and would not detrimentally affect the viewing experiences from these places.

Neighbouring Borough Views

362. The proposal's appearance in views from neighbouring boroughs has been considered. In many instances the proposal's appearance would be very similar to the strategic views assessed above, and the impact would not change.

363. The London Borough of Tower Hamlets have objected to the proposal's impact on the view of the World Heritage Site from Tower Bridge, and this impact is assessed in detailed above; officers conclude that no harm would be caused by the proposal in this view.

Conclusion - Strategic Views

364. The proposal would be sited at the eastern edge of the City Cluster, which seeks to consolidate strategic levels of growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of

the City and London. As a clear endpiece to the eastern edge of the Cluster, the proposal would play an important role in defining this side of it as an overall composition and would represent a key act of its consolidation.

365. The proposal would preserve the settings and significance of the Tower of London World Heritage Site, St Paul's Cathedral and the Monument. The proposal would preserve the composition and characteristics of all relevant strategic views.

366. Overall, the proposal would comply with Local Plan policy CS13, draft City plan 2040 policy S13, London Plan policy HC4, the LVMF SPG, City of London Protected SPD and associated guidance.

Heritage

Direct and Indirect Impacts

Holland House

367. Offices of 1914-16, a rare example of the work of Dutch architect H.P. Berlage in Britain, his only work in the UK. Built for a German-Dutch shipping, steel and mining conglomerate (Wm. Muller & Co.) to serve as its UK headquarters at the time, the building is a striking landmark, particularly in its use of light coloured faience and subtle nautical theming, in addition to some arresting interior architecture. The building's grade II* listing reflects this architectural and historic interest.

368. It is unique in the city as an example of a skilfully crafted, fully faience-fronted building by a highly regarded architect whose work is rare in Britain, constructed in the middle of the First World War when building work had virtually ceased. The architect used some innovative and emerging architectural ideas and construction techniques, upon completion, its design pointed to the future of the office building.

369. As well as the principal frontage, architectural interest is found in the tiled interiors of the building at basement and ground floor levels, which survive as designed by Berlage, most of these interiors are intact, although the building has received many alterations throughout its lifespan.

370. When initially constructed, Holland House sat in and amongst a rapidly changing 20th century townscape, in which purpose-built large floorplate office buildings were beginning to emerge alongside the older, finer grain buildings. The

now lost Baltic Exchange (1908) sat opposite the site at 30 St Mary Axe, which has subsequently been replaced by the Gherkin in 2004. The wider area was a tight knit neighbourhood, with narrow streets and a strong sense of enclosure resulting from buildings which fully occupied their plot boundaries.

Architectural, Artistic and Historic Interest

371. The purpose-built office building is an interesting part of H.P. Berlage's portfolio, it is thought to take inspiration from American architect Louis Sullivan. Berlage is a renowned architect from the early 20th Century, also known for the Amsterdam Stock Exchange. The remarkable idiosyncratic design, innovation, use of materials, and construction techniques give architectural interest, detailed below.

372. Designed for the oblique views along the original narrowness of Bury Street, the strong verticals on the principal façade were an unusual design for the time period, giving the building a commanding and solid presence whilst incorporating a significant amount of glazing. The arrangement of the facade in this way, to maximise light to the interiors resulting from the narrow structural grid, is structurally 'honest' and points to the integrity, and clarity of architectural concept behind Berlage's work. Finished in high quality faience, the materials were shipped at "considerable expense" by Wm Muller & Co, to deliver the quality of building they sought to occupy. The horizontal, decorative faience spandrel panels denote the floor levels of the interiors behind, these horizontal panels are embossed behind the vertical protrusions, accenting the dramatic vertical emphasis.

373. Lower down the building, black granite plinths give the building a robust and sturdy base, the building was designed with privacy in mind, the lower windows are smaller and slightly raised, particularly at ground floor level, to give privacy to the building occupants. On the southwest corner, an art deco ship motif is a nod to the buildings mercantile associations.

374. The building possesses high architectural interest from the quality of its exterior, particularly its boldness and individuality in an era where conventional architectural styles were transitioning from classicism to modernism. Furthermore, much of the external appearance largely stems from the emerging architectural and construction techniques of the time.

375. Holland House also derives architectural and artistic interest from the ornate interior spaces. A painter from the 1930s, Bart Van de Lack, worked with Burlage on the intricate design of the entrance halls and circulation spaces at ground and first floor level, specifically the attractive flooring and ceiling. The interiors exhibit traces of the origins of early Art Deco design in the interwar period, a noteworthy aspect of the design aesthetic when considering the period of the building. The

other office floors were more utilitarian in appearance and have since been heavily modernised. The building's architectural and artistic interest makes a high contribution to its overall significance.

376. Holland House has historical interest due to its former use, it was a purpose built office building at a time of dramatic change in the built environment. The intended use of the building and its associations with the shipping industry are thematic of the City of London's urban morphology, representing a historical confluence of finance, maritime commerce and the built environment. The materials were shipped from Holland by Muller & Co's own vessels and the building was subsequently occupied by a shipping or commerce organisation, although the Munitions Disposal Board (part of the Government), occupied the building for a brief period during WW1. These historical associations, and the historic interest provide a moderate contribution to the significance of the listed building.

377. The building has been considerably altered over its lifespan, most significantly with the construction of Bury House in 1967, which saw the demolition of most of its eastern elevation to St James' Court. A party wall was reintroduced on the eastern elevation of Holland House, finished in Portland Stone. The construction of Bury House also resulted in the loss of St James' Court and the truncation of Heneage Lane. Throughout the latter half of the twentieth century the building was altered in a piecemeal fashion, with various internal works resulting in the loss of many of the original office interiors and the reconfiguration of parts of the floor plans and entrances; the windows and roof structures are wholly modern. Despite these alterations, a significant amount of the historic fabric with architectural and historic interest remains.

Setting and Contribution to Significance

378. Holland House has a principal frontage facing north-west onto Bury Street and a secondary frontage facing south-east onto a small open space off Bury Street, James' Court. Both facades are seen as part of a dense urban townscape, which is characterised by a juxtaposition of hyper-modern, high density commercial office buildings and a lower density varied historic townscape, the site is closely neighboured by the tall buildings of the Cluster with the Gherkin, opposite, prominent in the foreground of views of the principal frontage and a prominent backdrop to the building's secondary elevation.

379. Holland House was designed to address the oblique views available along Bury Street before the loss of the Baltic Exchange and the creation of the more open Gherkin Plaza. The narrow street and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Accordingly, the narrow zones

around Bury Street from which these views are possible are considered to make a positive contribution to significance by illustrating the original design intent; this is also illustrated by the existing form of Renown House, which pre-dates the listed building and led to its configuration around it; stylistically the two buildings are leagues apart yet they were constructed in the same decade, which in turn illustrates the stylistic context then prevailing in the City. Accordingly, Renown House is an element of setting which contributes positively to significance.

380. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Holland House across the north-east and south-east corners of the new Gherkin plaza. As stated, the original, narrowly oblique views of the façade along Bury Street contribute to significance. Historic England have stated that the views from the Gherkin Plaza give an enhanced ability to appreciate the significance of Holland House, but this was not how the building was originally designed to be seen; the strongly vertical design and ordering of the façade were not created for these perspectives and do not have the same force in them. As such, officers consider that these views, whilst they allow the building to be observed from new angles, do not specifically contribute to significance.

Impact

381. The proposed works to the exterior would include necessary repair works to address the mild deterioration of areas of heritage significance. The south and west facades have varying degrees of damage to the faience, there is minor deterioration to both the external material and the steel structure behind. Some of the faience tiles have been secured by green netting on the top of the building. The repair works to the façade are necessary and the application would safeguard a part of the building of the highest significance. It is therefore critical that the works are an accurate replication to avoid any visual disparity in the completed works, these details would be secured through condition. The applicant would be required to appoint a specialist contractor, repair and replace concrete downstands and beams, replace ‘fake’ terracotta a spandrel panels, clean the façade with specialist advice, with new works and finishes to make good of the existing fabric and match the existing adjacent work with specific regard to be had to the methods used, materials, colour, texture and profile. Existing, original bricks will only be replaced where absolutely necessary. These alterations would preserve and enhance elements of the historic fabric of the building which substantially contribute to the building’s significance and would result in a minor enhancement overall.

382. The original Crittall windows have been removed, the current window frames are non-original, and are therefore of no heritage significance, these would be replaced by modern aluminium framed substitutes across all facades, the original

form of the windows would be respected using Crittall frame units. On the eastern elevation, the external materials would be repaired and replaced with reinstated glazed bricks, to replace modern alterations and use materials which would have been originally used, the existing Portland Stone is a non-original feature which was implemented in earlier alterations, this elevation is considered to detract from the buildings significance, the alterations would represent an improvement.

383. The former tenants access on Bury Street has been closed off, again by earlier alterations, the existing fabric here is of neutral significance, the proposals would reinstate the access point and provide an additional tenants entrance, following the original design intent, this would represent a positive contribution to the buildings significance. The package of façade alterations set out above would make positive steps to restoring the building to its original appearance, supporting the integrity of the original architectural design. The façade alterations are considered to contribute positively to preserving elements of the building which make a substantial contribution to its significance. They would result in a minor enhancement to significance overall.

384. The rather clumsy 1960s, 70s and 80s alterations above level 5 of Holland House would be replaced with 3 additional floors, plus an additional floor which partially covers the plan extent. The 1960s rooftop additions are an element of the building which currently detract from its heritage significance. The 5th floor would be slightly set back from the building line of the architecturally significant facades below, it would follow the line of the existing extension, but it would be slightly taller, this additional floor to ceiling height would follow the proportions of the existing facades below. Furthermore, the extension at 5th floor level would extend on to the roof of Renown House in part, this would maintain the strong cornice reading on the existing roofscape.

385. On floors 6 to 8, the façade line would step inwards from the principal façade at each level. The 20th Century Society, the Victorian Society, Save Britian's Heritage and Historic Buildings and Places and others have objected to the application, their objections (in part) relate to the additional storeys, which they state would have a negative impact on the listed buildings fabric, ability to appreciate significance and/or its setting.

386. These floor levels would be clad in a light-coloured pre-cast concrete, following a loose interpretation of the geometry of the existing facades of heritage significance below, the scalloping and shaping of the vertical elements would echo the character of the façade below and complement it. The stepping of the elevations and the light colour, would read as detached alterations at a high level, appearing as recessive, high quality additions in longer range views, they would have limited visibility.

387. Where they are visible, they would appear a well-considered design response. These additional storeys would have very minimal visibility in the oblique views for which the building was designed, and would only be visible in views where the original elevations of Holland House were never intended to be seen, in views from Gherkin Plaza. As set out above, these views do not contribute to the ability to appreciate Holland House's significance, therefore, these additions are considered to have a neutral impact on the buildings significance overall.

388. At the topmost 8th floor, the proposed terrace and greening would provide visual interest at a high level. The façades on these new elevations would be finished in white glazed concrete, this is considered to be an appropriate material palette to reflect the existing elevations whilst also respecting the primacy of the facades below.

389. The rooftop alterations listed above would have no negative impact on the ability to appreciate the historic facades lower down the building, they would be an improvement on the current, more recent and low quality rooftop alterations, it is the original facades give architectural interest and make a substantial contribution to the significance of the listed building, these original facades would retain their primacy. However, the rooftop additions would result in the partial infilling of the existing atrium, which would cause a degree of harm to the listed building and is discussed in more detail below.

390. Internally, Holland House would be combined with Renown House and the tower element of the proposal on the 31 Bury Street site, with which it would share a core and various functional elements. This principle of combination would take some of the functional pressure off the listed building, boosting its occupational density, improving the tenant services, improving the sustainability and M&E standards, providing accessibility/DDA compliance, providing end of trip facilities for the buildings occupants and upgrading the building to meet modern fire regulations. Whilst of course the current proposal is not the sole way of delivering some or all of the benefits above, these would flow from it.

391. The proposed internal works would include alterations to re-imagine the use of the heritage asset, plus necessary works to upgrade the building to meet modern standards. Overall, the alterations would enable the building to accommodate publicly accessible uses, inviting the wider public into the interior of the listed building for the first time in its 100-year history, in addition to providing more office accommodation.

392. The existing building at 31 Bury Street would be demolished and the new core located at the point where it linked to Holland House. Here, the proposal would result in some loss of floor slab and associated structure to Holland House, between floors LG to 5, which are of no heritage significance. Most of this area

was altered in the 1960s when Bury House was created and it is considered the most appropriate location for the core and the interconnections between Holland House and the tower element of the proposal.

393. The 20th Century Society, the Victorian Society and Historic Buildings and Places have objected on the basis of these alterations. As set out above, the fabric that would be lost in these areas makes a low contribution to significance. The building was listed after these alterations were made, nevertheless, the buildings' significance and heritage value lies in the quality of the external facades and the ornate internal decorative features, neither of which would be markedly affected through the creation of the shared core.

394. The interconnection between Holland House and Renown House by the removal of the party wall would create a larger floor plate. This enables the productive use of an otherwise limited and constrained space within Renown House and the party wall fabric that would be lost as a result of this alteration is considered to be of no heritage significance, the position of the party wall being maintained with nibs so that the original separation would remain legible.

395. The greatest single change to the interior would be the infilling of the atrium at level, creating bigger floor plates and accommodating the roof extensions above. The lower levels of the atrium would be preserved and would form a new internal space, although the functionality of the atrium as a way of bringing natural light into the building would be lost. As such, the proposals would result in a low degree of harm to the significance of the building by removing an element of its floorplan and original functional design.

396. At basement level, openings would be made in the existing, modern window apertures to provide direct access into the lower levels of the atrium, these modern apertures have no heritage significance. In this area the glazed brick wall surface would also be repaired to match the original. These alterations are considered to have no impact on the listed buildings significance.

397. In the heritage lobbies at ground and first floor, the decorative tiles will be cleaned, repaired and re-instated where lost, these are a key part of the buildings significance. The modern doors to the stair core will be replaced with Crittall replicas of the original design, to re-instate the design intent of the original architect in fabric that has previously been lost. In addition, a new lift car in a metal cage enclosure will be added to replicate the original design. A new stair core will be introduced to improve circulation between the basement and ground floor levels, the Victorian Society have objected to this aspect of the proposals, this alteration will remove fabric which is non-original and that currently detracts from the building significance. These elements of the proposal would re-present the

heritage lobbies in a more sympathetic manner and would result in a minor enhancement overall.

398. At first floor level, the panelled boardrooms will be repaired if necessary, some modern additions, such as carpets, will be removed to reveal the original tiles floor finish, and the modern boarded ceiling will be removed to reveal the original. These works will reverse unsympathetic changes which resulting in the loss or covering up of original elements, these changes would make a positive contribution to the buildings significance, in addition, new publicly accessible uses within these areas will give the public the opportunity to appreciate these elements of the building, enhancing the ability to appreciate the buildings significance.

399. In the modern office areas on floors 2-5, some of the 1980s stud walls will be removed and the interiors will be refurbished, this occurs in areas where there is no historic fabric of interest, these works will therefore have no impact on the buildings significance.

Indirect Impact – Setting

400. In views of the principal west façade of the listed building from and across Gherkin Plaza, the proposed tower would appear behind Holland House, occupying clear sky which presently exists as a backdrop to the west façade, introducing a prominent new element above the listed building the view. Historic England, LAMAS, the 20th Century Society, the Victorian Society, SAVE and Historic Buildings and Places have objected to the application and consider that the proposed building would diminish the appreciation of Holland House and have identified harm to the significance of the listed building as a result.

401. Officers do not concur with the conclusion of these objections in relation to the tower's indirect impact on the setting of Holland House. The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. Moreover, as previously set out, these newer views of the listed building across the Gherkin plaza make no contribution to the significance or appreciation of the listed building.

402. The tower would be barely visible in the areas of setting from which the original oblique views across Holland's House principal Bury Street elevation, which contribute to significance, are possible. The tower element would be more prominent in the oblique views from the junction of Bury Street and Creechurch Lane along Holland House's smaller, secondary façade to that part of Bury Street. The lower levels of the tower would obscure a sliver of this elevation, but it would

remain discernible in the view and would come into greater prominence as one moves towards it along Bury Street.

403. Accordingly, it is considered that the proposed tower would not cause harm to the setting and therefore significance of the listed building.

404. Renown House would be extended by 2 floors, with an additional full floor above the cornice line in the form of a mansard roof. Renown House does not form part of Holland House's listing, but is an element of setting which contributes positively to significance, chiefly because of the stylistic differences between the two. Some consultees have objected in relation to this additional mass, arguing it would have a negative impact on the setting of the listed building.

405. The proposed mansard roof and the new facades of the extension are considered to be attractively detailed, and are sympathetic to the facades of Renown House below. The 2 storey extension and new mansard roof would replace the existing attic storey (overtopped with a lift overrun), in a more coherent manner. The mansard would follow a more contemporary design, differentiating it from the traditional design of the facades below. The overall design of the extensions to Renown House would maintain the existing qualities of its relationship with Holland House; the interconnections between them would be sufficiently disguised so that the two would continue to read as separate buildings originating from different times, executed in different styles, preserving this important quality of the setting of Holland House.

Conclusion

406. In conclusion, the proposed development would result in minor degrees of harm and enhancement to Holland House. The alterations to re-present the external facades and internal heritage lobbies would result in a low level of enhancement to significance and are considered heritage benefits. The infilling of the upper levels of the atrium would result in a low level of harm to significance. The provision of public access to the heritage lobbies would result in a minor enhancement of the ability to appreciate significance.

407. Officers consider that there is clear and convincing justification for the harm that would be caused to the significance of the listed building. The works proposed which result in that harm would assist in unlocking benefits in the scheme and that the scheme would, overall, strike the right balance between conserving the main areas of the building's significance and reimagining it for the future. The benefits would not be achieved without the interventions which result in that harm. The heritage harms and heritage benefits identified are considered as part of the overall planning balance set out later in this report.

Creechurch Conservation Area

408. The proposal site is located within the Creechurch Conservation Area, near the western edge of the conservation area where it meets the City Cluster. As set out above, the site forms the southern half of a street block which includes Holland House and Renown House, the principal frontage of which forms part of the CA's western boundary along Bury Street.

409. On its east side, the proposal site includes 31 Bury Street which faces the group of characterful C19 and C20 warehouse buildings which are particularly distinctive elements of the conservation area and forms a terminus to the view looking west along Mitre Street.

410. On its north side, the proposal site is framed by 33 Creechurch Lane, Heneage Lane, Valiant House and Copenhagen House; the Synagogue and its courtyard lie beyond Valiant House to the north.

Character, Appearance and Significance

411. The conservation area was designated in January 2024. While no Character Summary and Management Strategy SPD has yet been adopted, the CCA Proposal (December 2023) document approved by Planning and Transportation Committee and Court of Common Council assesses the special interest and character and appearance of the conservation area.

412. Of the buildings that comprise the proposal site, the CCA Proposal notes (section 3.2) that No. 31 Bury Street 'is not considered to possess inherent interest, but is important in framing Heneage Lane'; that Renown House is a 'characterful survival of a small-scale, early 20th-century office building…it has good quality carved stone detailing and makes an effective contrast with the adjacent Holland House'; that Holland House 'has a very high quality of detailing and execution and is one of the architecturally standout buildings in the locality'.

413. Furthermore, the CCA Proposal sets out (section 4.2) the overarching summary of special interest of the conservation area. This comprises the attributes:

- Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;
- 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;
- 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 the resettlement and now the oldest in the UK), St

Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

- Strong and continuing associations with the Jewish community following resettlement in the C17, exemplified by the presence of Bevis Marks and the site of the First and Great Synagogues;
- A place of contrasting architectural scales, juxtaposed dramatically with the backdrop of tall buildings in the City Cluster.

414. Officers consider that the proposal would have the potential to affect attributes (ii), (iii) and (v). It is relevant to note that none of the objections to the impact of the proposal on the conservation area have taken this approach; they rely on generalised perceptions of impact rather than assessment against these formal attributes endorsed by Planning and Transportation Committee.

Setting

415. The setting of the conservation area is sharply contrasting, with the heart of the City Cluster of tall buildings neighbouring immediately to the west, acknowledged by attribute (v) listed above, which this element of setting supports to a minor degree. To the north and east are the fringe areas of the City, which make a neutral contribution to setting because the architectural character and historic environment is quite fragmentary; the same is true of the south. While the Lloyd's Avenue CA lies close by to the south, it possesses few affinities in architectural or historic character with Creechurch.

Impact

416. The proposal's visual impact on the Creechurch CA is the subject of numerous objections from the City's Conservation Area Advisory Committee (CAAC), Historic England and others. In particular, the CAAC's strong objection asserts that the proposal would result in 'gross overdevelopment… with significantly negative impact on the character and appearance… the lack of architectural quality and refinement…was noted, together with their significant negative impact on wider townscape views and heritage context.' These comments generally capture the objections on this theme; the full representations made have been considered by officers, and should be referred to.

417. The demolition of 31 Bury Street is not considered harmful in principle, noting its essentially neutral contribution to the CA. The provision of the Heneage Arcade across the footprint of this part of the proposal site is considered a minor enhancement of the character and appearance of the CA, by reinstating the lost extent of Heneage Lane; Historic England agree on this point. The roof extensions to Holland House and Renown House are not considered harmful in principle; in

relation to the CA, officers' conclusions in respect of these elements are as set out in the Holland House section above.

418. In many of the longer views of and through the conservation area, such as from Aldgate looking west, or at the bottom of Mitre Street looking north-west, the tower element of the proposal would appear as closely associated with the existing towers of the City Cluster within which the CA is partially embedded. This would be true of closer views from within the CA where only the tower element of the proposal is visible, such as of Bevis Marks Synagogue from within the courtyard, or from Bury Street looking obliquely across Holland House. The proposal's impact on views of the Synagogue is assessed in greater detail in the section below; the conclusion reached there would apply to the proposal's impact on this element of the CA.

419. In views of the proposal along Heneage Lane, Mitre Street and looking south along Creechurch Lane, the tower of the element would be seen coming to ground; in these specific views it would read as part of the City Cluster than of the CA; it would clearly `be disassociated from the historic scale of the CA.

420. In the view looking north along Creechurch Lane and away from the City Cluster, the tower element of the proposal would read as a more pronounced departure in scale from the relative consistency of the group on the north side of the street and the south side, which includes the characterful warehouses noted in attribute (ii). However, this would be mitigated to an extent by the visibility of 70 Bevis Marks and, in the cumulative, Bevis Marks House, and the contrasting scale of the proposal would elide with attribute (v) of the CA's special interest set out above.

421. In summary, therefore, when considering the impact of the proposals on the significance of the CA, officers reach a different conclusion from the various objectors on this matter, whilst attaching great importance to their views. The proposal would not conflict with any of the attributes of special interest set out above and would result in a modest degree of enhancement to special interest through the provision of the Heneage Arcade.

Indirect Impacts – listed buildings

Bevis Marks Synagogue

Significance

422. Synagogue of 1699-1701 by Joseph Avis. This is the oldest Synagogue in the country and survives to a remarkably little-altered degree. Avis had links to Wren's office and, architecturally, the building reflects the simple vernacular of some contemporaneous City churches and nonconformist chapels. Of a simple, rectangular plan form with simple red brick and Portland stone elevations with a pitched, slated roof behind a plain parapet. The principal, west elevation is symmetrically composed around the centered, main entrance door, flanked by two tiers of windows which run around the building, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense urban location. Above the entrance door is a tablet with the Synagogue's name etched in Hebrew: 'The Gate of Heaven/Sky'.

423. The interior is a single, double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers. The plan form, fixtures and fittings are largely of 1701, barring some minor later additions such as early C20 electric lighting. This place plays host to the religious traditions of the Sephardi Jewish community in Britain, known as *minhag*. Whilst practice here shares common worship and liturgical practice with other Jewish communities, for example reading from the Torah, there are particular rituals unique to this Synagogue (the *mitzvot*), such as the use of specific sung melodies by the *Hazan* in the reading of the Torah, which have been passed from generation to generation of the Synagogue's community.

424. It is a rich and intricate manner of worship, which cannot be experienced anywhere else, in a building of great age and rarity in a national context. Accordingly, this very old and rare intangible inheritance is considered to be of exceptional historical and communal interest; the building is of outstanding architectural, artistic and historic interest.

Contribution of Setting

425. The building retains its original setting, albeit with more recent buildings on some of the surrounding plots, located in an undemonstrative, off-street location in a private courtyard. It has no direct street presence except its south-east elevation to Heneage Lane, a quintessential city alley, on which the Synagogue manifests as a plain brick elevation pierced with three prominent, round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the former Vestry and Beadle's House fronting the north side of Heneage Lane and seen obliquely from Bevis Marks.

426. The inspector who reported on the Tulip proposal stated (at paragraph 14.52 of his report, with which the Secretary of State agreed):

"*Bevis Marks Synagogue (Grade I) is listed largely for its age, rarity and internal features. This does not mean that its setting is necessarily unimportant, but in this case it is largely limited to what can be experienced from within its courtyard*."

427. Otherwise, the principal approach to the Synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, consisting of two narrow rectangles of paved area flanking the Synagogue's north-east and north-west elevations. Within the tight confines of this space, the Synagogue is a massive, commanding presence. The courtyard acts as an extension of the Synagogue, a place where people can gather before and after services (and indeed the last place males and females can interact before entering for worship). There have been recent alterations to the courtyard including the construction of a ramp and steps to the new museum in the western arm and two booths, for ticketing and security, inside the entrance and in the eastern arm. Seen from the courtyard, the Synagogue is hemmed in by other buildings of a similar historic scale and mostly of the same brickwork materiality, including the former Vestry and Beadle's House which directly adjoins it to the east. There is a specific sense of an architecturally reserved and deliberately secluded setting.

428. Bevis Marks was the first purpose-built Synagogue in Britain following the formal resettlement of the Jewish community after centuries of exclusion. Its discreet, secluded setting is considered to be powerfully representative of this, making a strong contribution to the building's significance; the importance of the relationship between the Synagogue, its courtyard, Heneage Lane and Bevis Marks cannot be overstated. Consequently, it is proposed that these elements of setting form part of a bespoke Immediate Setting policy area in the City Plan 2040 to recognise and help preserve these qualities. For clarity, the application site is not within this proposed Immediate Setting policy area.

429. The sense of privacy, seclusion and reservation, coupled with the tight urban grain of this area of setting, means that the Synagogue is experienced through a series of informal vistas and closeups, rather than formally recognised views. However, it has been argued by S&PSC and other objectors that there is a 'sky view' of the Synagogue from the entrance to the courtyard, where the building is seen with clear sky above, which is important for religious and spiritual reasons.

430. Moreover, it has been argued by the Rabbi of the Synagogue and other objectors that the sky and views of it are especially significant for the Sephardi community, holding 'practical and symbolic' significance in the view of one authority (part of their objection dated 15 November). Officers do not profess expertise in these areas of religious history and practice and accept the view of these sources that the sky, in general terms, holds significance for the Jewish community in general and the Bevis Marks community in particular.

431. However, when it comes to translating this into a consideration of the Synagogue's setting as a listed building, officers take a different view to the various objectors. Clearly, it follows from the general significance that the sky holds to the Bevis Marks community, and the very name of the Synagogue ('The Gate of Heaven/Sky'), that there is a general affinity between the Synagogue and the sky or heavens. However, this is a dynamic which is true of many places of worship, many of which arguably express this more obviously through the use of architectural elements such as spires and pinnacles to create a skyline presence. As such, officers do not consider that the Synagogue's general affinity with the sky or heavens necessarily translates into a specific view of the Synagogue requiring the preservation of open sky. The sky is visible above the Synagogue in various viewing points from within the courtyard. It is to be noted that no formal designation or identification exists, or ever has existed, of the 'sky view' described by the objectors in relation to the Synagogue's heritage significance.

432. Officers therefore consider that, when it comes to identifying and quantifying elements of setting, what is clearly more tangible, unique and more important to the heritage significance of the Synagogue, as a listed building, is the special sense of seclusion described above, and it is this element of setting that is considered to make the greatest contribution to significance.

433. Further to this, it has been argued by the Rabbi of the Synagogue that the building was deliberately designed to have "prominence in relation to the buildings in view all around it. This prominence was not achieved in the manner of church spires, but through the massing of the synagogue itself in contrast to the buildings around it. This prominence is only maintained by ensuring its scale continues to dominate its surroundings, by carefully managing visible growth around it."

434. Officers fully agree with this statement: the Synagogue is a very prominent presence in the tight confines of the courtyard, easily commanding the space, and obviously the most prominent of the buildings which frame the courtyard around it. Officers have proposed the aforementioned 'Immediate Setting' policy area around the synagogue and its courtyard buildings to capture this very important quality. While some of the existing courtyard buildings around the Synagogue are presently higher than it, as a result of modern redevelopments in the intervening centuries since it was constructed, the Synagogue, through its powerfully simple architecture and massing, continues to be the most prominent building seen within the tight confines of the courtyard.

435. The Synagogue and its courtyard are located within the City Cluster and a number of existing and consented tall buildings are or would be visible from within the courtyard, notably (E-W) One Creechurch Place, 40 Leadenhall Street, 100 Leadenhall Street (consented), the Scalpel, the Gherkin, No. 6 Bevis Marks and

Bevis Marks House (consented). Otherwise, there is an open sky setting over the Synagogue and its courtyard. The narrowness of the spaces from which the Synagogue is seen makes it a commanding presence; many of these existing tall buildings are not immediately in the field of view and can only be fully appreciated by deliberately looking upwards.

436. While the contrast between the scale and character of the Synagogue and its taller modern setting is very noticeable, the contrast between the historic ensemble of the Synagogue and these new buildings is entirely characteristic of this part of the City, in which ancient and hypermodern buildings are frequently juxtaposed and throw one another into sharp relief. Seen from the courtyard, these modern tall buildings are perceived as being part of the modern City at a crucial remove from the secluded confines of the courtyard. They do not affect that prominence which the Synagogue has in relation to its courtyard setting identified above. With its fundamentally different scale and architectural character, this wider setting of the Synagogue is considered to make a neutral contribution to its significance.

Impact

437. The impact of the proposal would be indirect, via change in its wider setting, rather than direct and physical; the Synagogue would not be directly affected, its fabric would remain untouched, and the important sense of seclusion created by those elements of setting identified above would be preserved.

438. Given the secluded, off-street siting of the Synagogue, there would be little to no interface between it and the proposal before the observer reaches the courtyard. The exception would be in the sharply oblique views along Heneage Lane, where the lower stages of the proposal would be seen at the end of the existing Lane above the proposed Heneage Arcade. Here, it would appear as a bookend terminating the southern axis of Heneage Lane, while opening up new sightlines through the Heneage Arcade down to Bury Street. It would read as disassociated and set apart from the characterful ensemble of the historic brickwork frontages of the Vestry, Synagogue and Beadle's House.

439. In views from the courtyard entrance, from where both the Synagogue and the proposal can be viewed to their fullest extent, the proposal would appear directly behind the Synagogue's principal north-west elevation. It would mostly obscure the existing form of 40 Leadenhall Street, already visible in this view, and some clear sky space above and to the east of it; in the cumulative scenario, it would be seen alongside the consented (and technically implemented) form of 100 Leadenhall Street. The proposal would be seen behind Valiant House, which frames the Synagogue to the south-west, leaving the sense of seclusion established by Valiant House and the encircling courtyard buildings unbroken.

440. For clarity, the topmost storey of the proposed roof extension to Holland House would be visible as a sliver of development behind Copenhagen House, but this would be extremely minimal, would quickly recede from view and be barely impactful.

441. The proposal would be at its most visible from this viewpoint and would appear as a subtly articulated form of sophisticated pale blue faience. As one looks up the proposal would be seen to taper in width as it rises. It is this view which is the focus of the objections, some of which as mentioned refer to it as a 'sky view' of the Synagogue. Currently, from this viewpoint, there is clear sky over the Synagogue between the existing forms of One Creechurch Place and 40 Leadenhall Street. As described above, the proposal would infill a section of this clear sky, but would not result in the total loss of clear sky over the Synagogue. Clear sky would remain appreciable above the Synagogue from various other points within the courtyard. Even so, as discussed above, whilst recognising the role of sky views in religious observance, officers do not consider the sky to be an element of setting fundamental to the Synagogue's significance as a listed building, instead forming part of that wider setting which makes a neutral contribution.

442. When one is in the courtyard, one is already conscious of the Cluster of tall buildings in which the Synagogue and its secluded setting are located. Existing tall buildings are already visible in these courtyard views, and more would be in the cumulative scenario, especially the scheme at 100 Leadenhall Street. In this respect, officers consider that the proposal would form another part of this layer of the modern City, coexisting with the Synagogue and held at a crucial remove from it by the intervening, low-rise form of Valiant House and the encircling courtyard buildings. Its presence would be a visual manifestation of the modern City beyond, rather than a visual intrusion.

443. In views further into the eastern and western arms of the courtyard – approaching the Beadle's House and the ramped entrance to the Museum – the proposal would be far more recessive. The uppermost storeys of the proposal would appear as a small section of slender blue faience above the brick parapet of the Synagogue. Aside from the view from the courtyard entrance, these other courtyard views of the proposal would be glimpses, caught when deliberately craning the neck beyond a comfortable field of view.

444. The S&P Sephardi Community (S&PSC), Historic England, the Georgian Group and many others have objected the proposal's visual impact on the setting of the Synagogue as a listed building. This impact formed part of the Reason for Refusal of the previous scheme on the 31 Bury Street site.

445. There are subtle but material differences in the designs of the previously refused scheme and the current proposal which are appreciable in the key views of the Synagogue. There would be a different degree of articulation to the proposed north elevation which can be seen from the Synagogue courtyard, though this difference is a rather subtle one and the overall impression created by this area of both schemes may be said to be similar. A more obvious difference between the two is that the top of the proposal would be lower and more articulated, in a way which may be said to be quite noticeable.

446. The S&PSC's heritage consultant asserts that: 'by reason of its height and proximity the proposed tower will overwhelm the Synagogue.' Historic England state 'that the synagogue's 'precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale', and that the 'new tall building would become a dominant feature of the courtyard at the expense of the Synagogue, diminishing the latter's role as the focal point of the space'. The S&PSC find that the proposal would cause substantial harm to the setting and significance of the Synagogue; Historic England identify a medium level of less than substantial harm arising to the Synagogue as a result of the proposal (and a departure from the 'small degree of incremental harm' they found the previously refused scheme to cause).

447. Whilst attaching great importance to the views of the S&PSC as the building's occupiers, the statutory consultees and other concerned parties, and with great respect to the strength of feeling expressed in many of the objections on this matter, officers find that the visual impact of the proposal would not cause the damage which consultees refer to.

448. Officers consider that the many objections have overplayed the visibility of the proposal in the general experience of the Synagogue from within the courtyard, and underplayed how the tight confines of the courtyard means the Synagogue easily commands the space and is the pre-eminent and prominent presence. Officers further consider that the objections have downplayed the very clear distinction between the historic scale and materiality of the Synagogue and its courtyard setting, the obvious modernity of the proposal, and the fact that the Synagogue is already seen with a backdrop of tall buildings in the courtyard experience.

449. Officers consider the Synagogue to have a simple, resilient and commanding presence in the courtyard experience which is clearly disassociated from the modern city beyond, the existing towers of which have relatively brief prominence in the courtyard arrival experience before being largely occluded behind the Synagogue and its courtyard buildings when one is closer to the Synagogue. The proposal would, in most of the areas of the courtyard, be seen only as a glimpsed

and partial presence when one is looking up at the Synagogue's roofline and the clear sky which would remain over the courtyard.

450. At its most prominent, the proposal would be seen directly behind the Synagogue, as another architecturally sophisticated element of the modern city beyond. But, as with the visibility of the proposal from with the Inner Ward of the Tower of London, officers strongly consider the average viewer to be capable of distinguishing between ancient and modern elements in the same field of view and, in this case, discerning between the self-contained seclusion of the Synagogue and (its prominence within) its courtyard ensemble and the dynamic urban environment in which it resides.

451. Accordingly, officers find that, in baseline and cumulative scenarios, the proposal would preserve the setting and significance of the Synagogue.

452. The S&PSC, Historic England and other objectors have raised concerns about how the proposal's prominence in the courtyard arrival experience would impact on the ability to see clear sky above the Synagogue; in the words of Historic England, that the 'ability to see clear sky from the courtyard would be lost'; for the reasons set out in preceding paragraphs, it is the view of officers that the HE statement is not correct. The S&PSC, Historic England the other objectors assert in turn that the proposal would prevent the Synagogue's community from observing the emergence of the stars and the transit of the new moon from the courtyard, an important part of the Synagogue's liturgy, and so seriously inhibit their ability to continue worshipping at Bevis Marks. In the words of the Synagogue's Rabbi, from his objection dated 15 May, "each month, Jews gather outside after dark to recite *kiddush levana*, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer".

453. This did not form part of the previous Reasons for Refusal. As set out above, the differences between the two schemes, as they would appear in views of the Synagogue, are relatively subtle; there is no obvious design change between the two schemes that clearly relates to this theme of objection.

454. The S&PSC objection dated 15 May 2024 includes three photographs taken from a point in the courtyard which show the appearance of the moon over the Synagogue at different times. The applicants have taken this viewpoint as a basis for a Lunar Transit Study which has been submitted as part of the application and which the City has had independently reviewed by the BRE. Subsequently, the Rabbi of the Synagogue has indicated that it is in fact a different viewpoint from which the moon is viewed, further back towards the entrance portal where less of the Synagogue (and the sky above) can be seen. As a result the relevant position has been clarified. This alternative has been considered in an addendum to the

Lunar Transit Study. The Rabbi has submitted a further response to this, assessing the applicant's Study and providing more details about how the prayer is performed and how the moon relates to the culture and liturgy of the Synagogue.

455. The Lunar Transit Study and addendum put forward by the applicants and independently reviewed by BRE assesses the various passages of the moon in these views throughout the 18.6-year lunar cycle. It charts the positions of the moon at various stages over these cycles and maps them onto two aforementioned two viewpoints in diagrammatic form. These charts illustrate how, for the majority of the time, the moon is not visible at all from within the courtyard, being obstructed by the buildings in the observer's line of sight.

456. At the times in the cycle when the moon could be visible, it would appear just above the Synagogue and the courtyard buildings. The Lunar Transit Study maps the silhouette of the proposal onto these charts and demonstrates how it would result only in a comparatively small degree of obstruction to this experience, though proportionally greater from the point indicated by the Rabbi, with much of the moon's transit remaining visible from the courtyard even in the cumulative scenario with 100 Leadenhall Street. The charts further show how the moon would still be visible above the Synagogue as well as the courtyard buildings which frame it.

457. Officers have extensively considered the data and conclusions submitted by the applicants and the objectors on this matter. Officers conclude that the proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline.; officers conclude that the presence of the proposal would still allow the prayer to be said, but there nevertheless would be an impact on the ability to carry out this ritual.

458. Officers are very cognisant of the strength of feeling expressed and attach great importance to the views of the S&PSC as the building's occupiers, the statutory consultees and other concerned parties when considering this matter. However, on the basis of the available evidence, which is comprehensive and independently verified, officers conclude that, at the times in the lunar cycle when the lunar transit could be visible from the courtyard, the proposal would preserve open sky above the courtyard and therefore the ability to see emergence of the stars and the new moon from there; and whilst the proposal would lead to a small reduction in open sky for the stars to inhabit and the moon to transit, it would not completely remove the ability to see the stars or the moon from the courtyard.

459. As such, officers conclude that the proposal would allow the stars and the new moon still to be seen from the courtyard. Although it is matter of religious

observance, being a matter on which the officers do not profess expertise, based upon the information provided by those making representations, and on the analysis contained in the studies referred to, officers have concluded that there would be a continued ability to see emergence of the stars and the new moon from the courtyard at the necessary times (although the proposal would have an impact on the duration of the moon's visibility at these times) allowing that element of the ceremony of *kiddush levana* to take place, and that this aspect of the functioning of the Synagogue would not be prevented by the physical attributes and impact of the proposal. As such, and momentarily laying aside consideration equalities/amenity point of view of the impact identified, addressed later in this report, officers find no harm arising to the Synagogue's setting and heritage significance arising from this matter.

460. Further objections from the S&PSC and others relate to the perceived overshadowing of and impact on daylight and sunlight to the courtyard. This impact formed part of the Reasons for Refusal for the previous 31 Bury Street scheme and is treated from an amenity point of view and in greater technical detail in the relevant sections of the report. The findings as they relate to the heritage significance of the Synagogue are summarised below.

461. The S&PSC's consultant has alleged that the proposal's 'visual and psychological impact on the courtyard would be catastrophic'; the S&PSC assert that the proposal would seriously inhibit their ability to use the courtyard, but do not provide evidence as to why. The applicant has submitted studies – which the CoL has had independently reviewed by third parties – that confirm that the proposal would not cause any discernible reduction in daylight and sunlight to the courtyard and that, overall, its amenity would not materially change. Again, officers have no objective evidence to contradict this conclusion, and accordingly find no harm to the Synagogue's setting and significance arising from this perceived impact.

462. Many objections have been received in relation to the potential impact of the proposal on daylight and sunlight levels to the interior of the Synagogue and its ability to function. This potential impact did not form part of the Reason for Refusal of the previous scheme.

463. During daylight hours, the Synagogue's capacious windows provide a level of ambient light which enables an appreciation of the exceptional interior and allows services and readings to take place. There are large windows on all four elevations, resulting in a multi-aspect interior receiving daylight throughout the day. The building's densely urban location means that the levels of ambient natural light are relatively low, though enough to appreciate the historic interior and for the building to be used for its current purpose. Artificial light within the building is minimised and largely restricted to historic fittings.

464. The potential impact on the amenity and usability, rather than the heritage significance, of the Synagogue is fully set out in the Daylight and Sunlight section of the report below. Assessments of the impact of the proposal on daylight and sunlight into the Synagogue have to be grounded in quantifiable, BRE-compliant evidence, rather than subjective assertions. The extensive technical assessments undertaken show that the diminishment of the internal light levels within the Synagogue would be negligibly noticeable in the main, ground floor area of the building and slightly more noticeable, but in a limited area, at the mezzanine level on the south side. This evidence leads officers to conclude that the proposal would not affect (i) the visual appreciation of the historic interior, (ii) the visual appreciation of those particularly significant features such as the *bimah* or the *ark* and that, therefore, most importantly, the proposal's impact on light levels would not diminish the ability of the Synagogue to function or prevent any of the activities within, including circumcision, to be undertaken.

465. A further theme of objections is that the proposal would negatively affect the Synagogue's new Heritage Centre, although this is not substantiated with evidence, and from the findings of the technical and professional assessments above officers do not consider that any adverse impact could occur.

466. As set out above, the variations between the previously refused scheme and the proposal are, in respect to experiences of the Synagogue, comparatively minor. In relation to the previous scheme, officers considered all the areas of impact set out above, with the exception of the lunar transit. In all these areas officers concluded that the previously refused scheme would not result in a harmful impact upon the Synagogue or its setting.

467. A different view was taken by the City's Planning and Transportation Committee, which refused permission for the development because it would, in part, 'adversely affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue.'

468. Officers are extremely cognisant of the strength of feeling in the objections relating to the Synagogue and have required extensive and at times unprecedented levels of detail and assessment from the applicants in order to consider the impacts discussed above, whilst noting the relative similarity between the two schemes in these experiences. Officers have had regard to the previous decision of the Committee and to the principle of consistency in decision-making. However, officers consider that the technical evidence upon which this application is assessed does not support the previous reason for refusal.

469. As such, in respect of the proposal now under consideration, for all the reasons set out above, officers reach the same conclusions as for the previous scheme. Overall, in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposal would preserve the setting and significance of the Synagogue and the ability to appreciate it.

470. In their objections the S&P Sephardi Community argue that the proposal would cause harm to the significance of the Synagogue and that public benefits will only outweigh that harm if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits. As set out later in this report when considering the heritage balance, within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a listed building and weighing that harm against the benefits. The decision maker does not have go about balancing harm against benefits in a particular way. The legal advice relied upon by the S&P Sephardi Community states that "it would be amply open to the Council to take the view that clear and convincing justification for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist with (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of the harm that would be caused-including viability evidence.". In the view of officers no harm would be caused to the significance of the Synagogue (or the Tower or London) and therefore there is no requirement to balance harm to the significance of those designated heritage assets against benefits.

Renown House (Non-Designated Heritage Asset)

471. Renown House, Nos. 33-34 Bury Street, is on the corner of Bury Street. It is a non-designated heritage asset, its significance is derived from its historic, architectural and artistic interest, it also derives significance from its group value and setting with its neighbours on Bury Street, which form the eastern edge of the Creechurch Conservation Area, marking the transition between a historic townscape to the east and the modern City Cluster to the west. The Victorian Society, Save Britain's Heritage and Historic Buildings and Places have objected to the proposals relating to Renown House, stating that Renown House is a non-designated Heritage Asset and the proposed impacts to the building would harm its significance.

Architectural, artistic and historic interest

472. Renown House is a four-storey building with a basement and attic, built for a successful Dutch import-export trading business Bunge & Co. in 1912. Bunge & Co. Bunge & Co. expanded internationally through the 20th century and the firm established its London headquarters on Bury Street as a result of this rapid

international expansion, these offices were purpose built. It was occupied by shipping firms until the late 20th century.

473. It was designed by one of the City's leading commercial architects from the early 20th Century, Delissa Joseph, who completed numerous high quality buildings across London throughout his career. It is not statutorily listed, and is considered to be one of Delissa Joseph's lesser known works. It is stylistically conservative for its time, particularly when compared to its neighbour Holland House, the historic associations with the architect and the former use of the building give historic interest, which makes a moderate contribution to its significance.

474. Renown House is a Portland Stone clad building, with a grey granite ground floor, designed in a neo-classical manner. It is a characterful survival of a small-scale early 20th-century office building, once a common type in the City. The ground floor has attractive detailing above the entrance portal, it has typical classical proportions and restrained classical detailing, the cornices are relatively simple but contribute to the overall character of the building. The windows at ground floor level are modern replacements but fit the prevailing aesthetic, railings in front of the lower ground floor levels are also coherent with the architectural style.

475. The upper levels, predominantly finished in Portland Stone have good quality carved detailing, the carved stone has a variety of relatively simple forms which decorate the pilasters, spandrels and cornices, overall the facade has an attractive and well considered external appearance. The windows are dark green metal modern replacements. At the upper levels, a chimney stack adds character, but several excrescences at roof level, such as balustrades, dormer windows and a lift overrun detract from the design quality.

476. Holland House wraps around Renown House and appears either side of its street facing elevations. Overall, it makes an effective contrast with the adjacent Holland House which is Grade II* listed, and makes a positive contribution to the character and appearance of the Creechurch Conservation Area. The quality of the external appearance gives architectural and artistic interest, which makes a moderate contribution to its significance, this significance overall is however limited as the building is not statutorily listed.

Setting

477. Renown House has southern and eastern elevations facing Bury Street. These facades are seen as part of a varied townscape, its immediate neighbours are historic buildings, with more modern commercial office developments framing

wider views of these facades, the site is in close proximity to the City cluster and Gherkin Plaza.

478. The backdrop to the Renown House elevations are clear sky and roof level modern excrescences on Holland House, no. 5-10 Bury Street and Bury House. The building remains part of a street block of a comparable scale and density to when it was originally constructed, this element of setting gives a low contribution to the significance of Renown House. The rooflines and building heights vary slightly, the roof level of neighbouring Holland House is slightly higher, the cornice lines are slightly offset resulting in limited coherence between the roofscape, this element of setting could be improved.

479. Originally positioned on a narrow street opposite the former Baltic Exchange. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Renown House across Gherkin Plaza. These views provide a low contribution to the ability to appreciate the significance Renown House.

Impact

480. The proposed development includes window replacements, façade alterations at ground level, the insertion of 2 new floors, a new mansard roof and a new internal interconnection with Holland House as part of the alterations to Renown House. The most significant external change is the increase in height, at street level this will be seen as 1 additional floor in the same architectural style as the main body of the existing façade, with a new, modern mansard on top.

481. On the new ‘full’ floor, the proportions, architectural detailing, appearance and materials would match the facades below, the extension to the ‘main body’ is considered to be sensitive and an appropriate high quality design, the materials would be conditioned to match the existing, special care and attention will be paid to the material selection, colour palette, and jointing, so the extension fits seamlessly with the historic façade below.

482. The windows would be replaced with PPC metal framed windows, which respect the existing proportions of the facade, they would be an upgrade on the existing, non-original windows. At ground floor level, the windows, doors, cills and slabs would be dropped to be level with the street, giving the base of the building a more permeable and open street level presence, improving the buildings relationship with the street.

483. The existing attic story, which is overtopped with a lift overrun, chimney stacks and untidy balustrades/rooftop access, would be removed and replaced with the modern mansard design and dormer windows, it would differentiate the new

addition from the more traditional style building below, tidying up the roofscape with a sympathetic yet contemporary design. The proposal preserves the existing buildings external expression with a thoughtful and appropriate, albeit contemporary, architecture. These external alterations, whilst being high quality, would alter the original design intent of the building and remove a large proportion of original fabric, causing a low level of less than substantial harm.

484. Renown House would remain subservient to Holland House when viewed from the west, this massing change would improve the massing relationship of the street block, creating better parity in building heights, but Holland House's pre-eminence would remain. The positioning of Renown House within and its relationship to the rest of the historic block forms part of its setting. The rooftop extensions to Holland House and the proposed tower on Bury House would be visible above the roofscape of Renown House. Discussed elsewhere in the report, the design and appearance of these would high quality, these new additions to the buildings would be visible in conjunction with Renown House when viewed from the south side of Gherkin Plaza. Close up, particularly from the south, the additional upper levels of Holland House would be visible, the existing upper floors of Holland House appear as set back elevations which fold and cascade away from Renown House, the proposals for Holland House would largely have the same effect, the experience for the viewer would be very similar in these views, Renown House would still read as part of a historic block due to its relationship with Holland House. The increased height of Holland House would have a neutral impact on the setting Renown House which contributes to its significance.

485. At present, clear sky appears above Renown House, which gives visual clarity and coherence to the scale of the historic street block, this would be eroded by the construction of a tower on Bury House, the proposed tower would be disturb the viewers ability to appreciate the architectural interest of Renown House. Historic England, Historic Buildings and Places, Save Britain's Heritage and the Victorian Society objected to the proposals, stating the additions and would be overbearing and distracting, which officers concur with to a degree. Renown House has always sat as part of a tight knit, historic urban block, however, its context is also characterized by other tall buildings and taller modern commercial office developments. The proposals for the tower on Bury House would erode clear sky and the viewers ability to appreciate the significance of Renown House, this negative impact on setting would result in a low level of less than substantial harm to Holland House.

Conclusion

486. Overall, officers consider that the proposed designs for Renown House would successfully integrate with the existing building and its neighbours, however, the proposals would detract from its architectural, artistic and historic interest and

setting due to the scale of the interventions proposed to the fabric of Renown House, in addition, the scale of the tower would have a negative impact on the setting, both these consequences amount to a low level of less than substantial harm.

487. The essence of its architecture and appearance will not negatively change under the proposals. The proposals will enable the building to continue to positively contribute to the City and the wider development within the application redline. The modest change to the building's massing is entirely appropriate and proportionate to its low level of heritage significance. Its ability to make a positive contribution to the townscape will not be removed, despite the low level of less than substantial harm.

Indirect Impacts on significance and setting of Designated Heritage Assets

Church of St Katharine Cree: grade I

Significance:

488. At the corner of Leadenhall Street and Creechurch Lane is the Guild Church of St Katharine Cree, established by 1631 with a tower of c. 1504, is of outstanding historic, architectural and archaeological interest. It predates the Great Fire and is a rare example of the early use of classical architectural motifs (internally) alongside the then more traditional perpendicular gothic (externally).

Setting

489. The church benefits from an enclosed churchyard to the north-east that contributes to its significance. Part of a street block, the setting of the church is complemented by buildings of broadly sympathetic scale. These neighbouring buildings include historic warehouses but also modern office buildings which form quieter, neutral components of the church's setting.

490. The City Cluster, including the Leadenhall Building, the Scalpel, 40 Leadenhall Street, 30 St Mary Axe, and 22 Bishopsgate, forms a significant part of the wider setting of the listed building and can be seen in views along Leadenhall Street. The upper part of the existing Aviva Tower is also visible in some of these views. These buildings do not contribute to the Church's significance. They define however, its wider setting characterised by modern, tall commercial buildings at the heart of the City Cluster. The site, which is presently views obliquely from the church, makes a neutral contribution to an appreciation of its significance. The

twentieth century character of the main facades as existing set it apart from the neighbouring Victorian and Edwardian architecture, and it is altogether much plainer in appearance and does not follow the prevailing parapet height along the street.

Impact:

491. The proposed building would appear in views of the church. When looking from the south and south-east, (View 46) the proposed building would appear in the backdrop as part of the City cluster of towers. While the scale of the site will change in these views, this maintains the present character of the site which is currently experienced as a modern intervention to the northern end of the street, noting that the existing relationships in the foreground between the Victorian and Edwardian buildings will be preserved. The location of the site in relation to the church also ensure that views towards its tower are preserved.

492. The GLA consider that the proposed building would, by altering the scale of the built form and reducing the level of open sky on the street, cause harm to the setting of the church.

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

Gateway in churchyard of Church of St Katherine Cree (Grade II)

494. The contribution of setting to an appreciation of the significance of this listed building, is limited primarily to the church yard of St Katherine Cree. Due to the very enclosed character of the setting of this asset, the proposals are considered to preserve those aspects of setting which have been found to contribute to significance. Therefore, the proposed development would have a neutral impact upon the listed building's significance or the way this significance is appreciated.

St Andrew Undershaft (Grade I)

Significance

495. The Church of St Andrew Undershaft is located at the intersection of Leadenhall Street and St Mary Axe, to the south-east of the site. A rare survival, dating to the 12th century, rebuilt in the 16th century, of squared rubble and stone incorporating an 15th century tower with a polygonal stair turret, which is partially rendered. Inside, there are several notable monuments and fittings.

496. Similarly to Church of St Helen, the church is of high historic interest as a rare medieval church that survived the Great Fire of London and the Second World War. Damage from an IRA bombing in 1992 resulted in the loss of its remaining 16th-century windows.

497. Architectural interest survives from the appreciation of its medieval architectural style and materials including the distinctive silhouette of the tower. It is a fine example of its kind and a particularly good, and now rare, example of a City church that predates the Great Fire.

Setting

498. St Andew Undershaft is located at the southern end of St Mary Axe, just before it meets Leadenhall Street. Both streets are historic, and originally developed on all sides - Leadenhall and ancient route connecting Cornhill to Aldgate and St Mary Axe reflecting part of the City's medieval layout.

499. The setting of the Church was originally densely developed and has changed dramatically over the years, with the most drastic changes in the 20th century, and is now characterised in the main by modern, tall commercial developments which make a neutral contribution to its significance.

500. The small surviving churchyard to the north, including its walls and railings, contributes to the building's setting and significance. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset's significance.

501. Modern office buildings and tall towers of the City Cluster, such as the Leadenhall Building 30 St Mary Axe, 52 Lime Street, and 40 Leadenhall Street are some of the tall buildings in the immediate vicinity of the Church. The relationship of the asset and 30 St Mary Axe which is visible directly behind of the Church tower in views from Leadenhall Street has become an iconic and frequently photographed one, joined recently (in the cumulative scenario) by the form of 100

Leadenhall Street directly to the east of the church. Apart from the juxtaposition in terms of height, the contrast of the design and materiality of these buildings add further interest to this view, amplifying the historic character of the masonry church, albeit in a way unrelated to heritage significance, setting and an appreciation of it.

Impact

502. The GLA have identified a less than substantial, low to middle degree of harm to the significance of the listed building through impact upon setting.

503. Under the baseline scenario, the proposed building would appear as a prominent feature on the skyline in views of the church. Views 53 and 54 show the upper levels of the proposed building would rise above the neighbouring buildings to the east of the church and present a prominent new element in the view. However, under the cumulative scenario, the proposed building would be completely occluded by the consented form of 100 Leadenhall Street.

504. As with St Katherine Cree, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. Officers therefore do not agree with the conclusions of the GLA. While visible, the proposals preserve views towards the church tower across the junction and from the immediate locality. Similarly, the proposals are considered in keeping with the existing backdrop character within these views. As such, it is considered that the proposed building would not harm the setting or significance or setting of St Andrew Undershaft.

505. Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church's setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it. The proposal would be the latest addition to the now arguably iconic setting of modern high-rise buildings which frame the church, and its medieval charisma would remain undimmed.

Church of St Helen Bishopsgate: Grade I

Significance:

506. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. Uniquely, it combines a nunnery church and a parish church side by side. The Church dates back to a Benedictine priory for nuns which was founded in 1210. While most of the outer structure dates from the 13th century, there are elements from the 12th, 14th, 15th, and 16th centuries. The church is of outstanding architectural, historic and archaeological significance. It is one of the City's few surviving pre-Fire buildings.

507. It is built of partly rendered rubble, brick and ashlar. In 1992 and 1993 IRA bombs caused damage to the church. Despite some reordering of the interior many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance.

Setting:

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

509. Due to its location within the City Cluster, the setting of the church has changed considerably in more recent years. There is a pronounced contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes Aviva Tower, the Leadenhall Building, Tower 42 and 100 Bishopsgate and 22 Bishopsgate, to the north and south. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape. The juxtaposition between the historic church and the surrounding tall commercial buildings emphasises the venerable historic character of the church, albeit in a way unrelated to heritage significance and setting.

Impact:

510. The GLA have concluded that there would be a very low level of less than substantial harm caused to the significance of the Church through contribution to its setting as a result of the proposals.

511. In the baseline scenario, the proposed building would partially infill the existing clear sky gap between the Gherkin and No. 1 Undershaft (View 44). It would be partially occluded by the churchyard tree when in leaf but would be more visible in the winter months. However, the setting of the church in this view is predominantly of taller modern forms and the proposed building would be an augmentation of this. Additionally, in the cumulative scenario, the proposed building would be occluded by the consented 1 Undershaft and 100 Leadenhall Street. The proposed building is not considered to harm the setting or significance of St Helen Bishopsgate.

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

Significance:

512. The Church of St Botolph Aldgate has historic interest as it dates to 1741-4, to the designs of George Dance the Elder. Architectural interest derives from the appreciation of its architectural styles, materials including stock brick and classical stone detailing and a distinctive obelisk tower. The church tower and spire rise prominently from the body into open clear sky and have a landmark quality.

513. The Church has group value with the Grade II listed wrought iron gates (probably dating from the early 19th century) with open work piers on Portland stone base, to the entrance of the churchyard.

Setting:

514. The setting of the church includes the churchyard, with its associated planting, trees, drinking fountain and police call box, enclosed by the listed railings and gates. These elements make a very positive contribution to the significance of the church. A positive element within the Church's setting, only recently added in the early 21st century, is Aldgate Square. The whole ensemble of the Grade II* Aldgate School, the Square and the Church form a striking and sympathetic townscape group of great character and interest. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with tall buildings of the Cluster set some distance away to the west. Aviva Tower is visible to the west of the church, between 30 St Mary Axe and 122 Leadenhall Street. These modern elements of the setting make a neutral contribution to the significance of the church.

Impact:

515. The proposed building would be seen in the backdrop of the church as part of the City Cluster (View 38 and 39). The GLA and The Georgian Group consider that the proposed building would cause a low to middle level of less than substantial harm to the setting of the church. Your officers do not concur with this conclusion. In the baseline scenario, the upper levels of the proposed building would appear above existing tall buildings within the cluster, to the left of the church when viewed from the east (View 38). In the cumulative scenario, the proposed building would sit in front of 1 Undershaft and 100 Leadenhall, partially occluding them, but the consented schemes would rise much higher behind the proposed building. In view 39 where the cluster appears directly behind the church tower, in the baseline scenario the building would introduce new, taller built form immediately adjacent to the church spire; however, in the cumulative scenario,

again the consented towers at 100 Leadenhall and 1 Undershaft would rise higher than the proposed building behind the spire. Overall, the proposed building would read as a distant element of the established City Cluster of towers in the backdrop to the church when seen from the east. The proposal would preserve its setting or significance and the ability to appreciate it.

Church of All Hallows by the Tower (grade I)

516. Church of Saxon origins, medieval fabric, a brick tower of 1659 and extensive post-war rebuilding by Seely and Paget. The building is of very high historic and architectural significance as an ancient survivor whose myriad architectural phases testify to the waves of change that have characterised the City of London for the past thousand years.

Setting

517. The building's setting is greatly changed, and it now draws only a modicum of significance from its setting. Due to distance and intervening development, the site is not visible from the church, making a neutral contribution to an appreciation of its significance.

Impact

518. The GLA have identified a less than substantial, very low degree of harm to the listed building, through impacts to its setting. Under both cumulative and baseline scenarios, (Views 56 and 57) the proposed building would be seen at a distance to the north or occluded by the fabric of the church itself. In both bases the proposals do not interact the silhouette of the church, but are seen in the backdrop behind further intervening development demonstrably as part of the existing City Cluster. Officers therefore do not agree with the conclusions of the GLA. The proposals are considered to preserve the existing contribution of setting to an appreciation of this listed building's significance, with no harm arising to its significance.

Lloyds Building (Grade I and Grade II)

Significance:

519. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners, opened in 1986. The stone façade, originally designed by Sir Edwin Cooper between 1925-1928 and listed at Grade II in 1977, is included in this assessment as it was integrated into the RRP building's design in the 1980s.

520. The Lloyd's building has historic interest as a highly inspirational late 20th century building by one of Britain's most significant modern architects for an internationally important organisation that successfully integrates the traditions and fabric of earlier Lloyd's buildings (including the Adam Room, originally from Bowood House and the 1925 Cooper façade).

521. The building has architectural interest as a prominent and high-quality example of high-tech architecture, with its design exemplifying architectural innovation, high quality materials and flexibility of plan throughout its impressive interior and exterior. The building's futuristic appearance and the clear architectural expression of different functional spaces contribute to a bold aesthetic.

522. Situated in the heart of the City, the Lloyd's Building forms a strikingly incongruous backdrop to many listed neighbouring buildings. It has notable group value with the nearby Grade II* Leadenhall Market, an important Victorian commercial building to which Lloyd's nods with its glazed atrium. To its neighbouring buildings it presents a strikingly original aesthetic which has never been replicated in quite the same way within the Cluster. Its high-tech facades, shining metalwork panels and complex elevational design consistently draw the eye and make it one of the most standout buildings in the heart of the Cluster.

Setting

523. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting. Tall commercial buildings define its immediate context, the Leadenhall Building, 8 Bishopsgate, and 22 Bishopsgate to the north, the Willis Building and 52 Lime Street to the east, and 1 Leadenhall to the west. Most of these buildings make a neutral contribution to the significance of the Lloyd's Building. However, the Leadenhall Building, also designed by the Richard Rogers Partnership, with similar architectural elements such as exposed circulation and services is considered to make a low contribution to the Lloyd's Building's significance.

524. The existing building on the application site makes a neutral contribution to the significance of the Lloyd's Building with no intervisibility between the two.

Impact

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

526. Dramatic contrasts between old and new are a characteristic trait of the Lloyd's Building's setting. The proposed development would be consistent with this character by adding a high-quality architecture to the existing group of tall, modern buildings, reinforcing the City Cluster's character, and in its different footprint creating townscape drama and interest that would not be harmful to the setting of the Lloyd's Building but, indeed, would create new ways to engage with it. The relationship and juxtaposition of the Lloyd's Building with both historic and modern buildings that contribute to its significance would remain unaffected. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Trinity House: grade I

Significance and Setting:

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

Impact:

528. The proposed building can be seen behind Trinity House in View 25, where it would be seen to the right of the established Cluster. In the cumulative scenario, it would remain in clear sky behind Trinity House. However, it would be read as part of the emerging, dynamic backdrop of modern tall buildings in the City Cluster, also as shown in View 28, and in View 47 where it would be occluded by trees in Trinity Square Gardens. There would be no harm to the setting or the significance of the listed building which would remain pre-eminent in the immediate foreground setting. The GLA have concluded a very low level of less than substantial harm to the setting of Trinity House. Officers do not agree with this conclusion and find that the setting and significance and ability to appreciate the listed building would be preserved.

Tower Bridge: grade I

529. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. It represents a triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets

and pinnacles. The dramatic symmetrical composition acts as a ‘portal’ to central London from the River and has become an iconic and internationally recognised landmark of London.

530. The building possesses very high architectural/artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Setting

531. Elements of setting which make a substantial/significant contribution to the significance and appreciation of the heritage asset are set out in relative order of contribution below:

532. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen’s Walk, the North Bank and Butler’s Wharf. From here its commanding, strategic siting, architecture and silhouette stands sentinel, guarding the entrance to central London from the sea and as a City (and London) Landmark.

533. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360 degree panoramic context with those other defining landmarks and features of the historic Pool, including City Hall, the Tower of London, the Monument, St Paul’s Cathedral, Old Billingsgate and the London Custom House. In addition to those the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of it.

534. The local and wider townscape views/approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at ‘More London’ on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul’s), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These make a significant contribution to significance and an appreciation of it.

Impact

535. The GLA has identified a less than substantial, very low level of harm to the significance of the listed building.

536. The proposals will be visible, seen from and in the backdrop of the bridge from the south-east, from Butlers' Wharf and other locations along the South Bank (Views 8, 10, 16, 17, 18, 21, 29, 30). In these views the proposed building would be seen as a high-quality architectural addition, experienced as part of an established City Cluster of modern towers to the north of the bridge. In all views the tower would remain the commanding foreground landmark guarding the Upper Pool of London. While visible in the backdrop, the overall contribution of setting to an appreciation of the listed building's significance is considered to be preserved. Officer's therefore do not agree with the conclusions of the GLA. There would be no harm to the setting or the significance of the listed building.

537. In both the baseline and cumulative scenarios, the proposal would not change the existing composition of the view, nor the visual focus in the view; it would read, like the rest of the Cluster to the north of the bridge, as disassociated from the iconic listed building. It would preserve those elements of setting identified above and thus the significance of the listed building and an appreciation of it.

Lloyd's Register of Shipping: grade II*

Significance:

538. The Lloyd's Register building, 71 Fenchurch Street, was completed in 1900 by architects T.E. Collcutt and B. Emannuel, was developed alongside a masterplan for the street by property developer James Dixon. This three-story building with an attic has long elevations on Lloyd's Avenue and a shorter one on Fenchurch Street.

539. It has historic interest as a grand classical building to act as the headquarters of a leading independent shipping classification organisation. Architectural interest derives from the appreciation of its free classical style described by Pevsner as "arts and crafts baroque," featuring extensive sculptured and carved decoration, being a superb example of the integration of architecture with sculpture. It reflects the late 19th and early 20th-century trend for grand classical stone-clad buildings in the City of London and features a 14-storey extension by Richard Rogers Partnership (2000) which is not included in the listing. Despite the tall extension, it retains a clearly legible setting with the Edwardian enclave of masonry offices along Lloyd's Avenue, which enhance its architectural and historic significance.

Setting:

540. The coordinated development flanking both sides of Lloyds Avenue, overseen but not individually designed by Colcutt (now known as the Lloyd's Avenue Conservation Area), forms a positive element of the setting of the listed building and enhances its significance.

541. The City Cluster, positioned to the north and west of the listed building, forms part of its wider context and setting. Tall buildings including 20 Fenchurch Street, visible from along Fenchurch Street to the west, while 40 Leadenhall Street defines the views north along Lloyd's Avenue. The surrounding modern mid-rise and tall buildings do not directly contribute to the significance of the listed building but contribute to a visually interesting, contrasting modern context.

Impact:

542. The listed building is visible in Views 40 and 52 of the THVIA. In View 40, northerly from Lloyd's Avenue, the listed building is only glimpsed. The proposed development would appear to the right of 30 St Mary Axe in this view, forming a prominent new element in the background of the listed building in northerly views from Lloyd's Avenue. However, it is significantly offset from the listed building, which remains legible, albeit obliquely, in the foreground. In the cumulative scenario, 100 Leadenhall would infill much of the sky gap presently seen in the northerly views, appearing as more prominent in this view than the proposed development. In View 52, taken on Fenchurch Street to the east of the listed building, the proposed development would appear as new built form behind the mid-rise buildings in the middle ground, showing some intervisibility with the listed building.

543. The proposed development would not affect the relationship of the Lloyd's Registry with the historic buildings along Lloyd's Avenue or other positive elements of the setting of the listed building. Due to its distance from the site, intervening buildings and its location in the context of established tall buildings in the wider context of the asset, the proposals be read as part of the modern Cluster distant and disassociated from the listed building. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it. The GLA have identified a low level of less than substantial harm to the setting of the Lloyd's Registry, but your officers do not agree with that conclusion for the reasons outlined.

Former Port of London Authority Building: grade II*

544. Offices of 1922 by Sir Edwin Cooper for the former Port of London Authority. Crowned by a distinctive tower incorporating allegorical sculpture, the building is

a rich and robust essay in the Edwardian Baroque and possesses high architectural and historic significance. It draws much significance from its setting, too, with Trinity Square and its monuments in the foreground and the neighbouring Trinity House all coalescing to form a dignified group of buildings illustrating London's seagoing past.

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

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

Significance and setting:

546. A school of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all contribute to the building's setting and significance. To the east, the church's setting is further enhanced by the open space of Aldgate Square and the group relationship with St Botolph's church; to the west, the school is framed by the finer grain and historic townscape of Mitre Street. The setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the Cluster located to the west.

Impact:

547. The proposed building would be seen in the backdrop of the school as part of the City Cluster in views looking northwest from the junction of Aldgate and Leadenhall Street (looking down Mitre Street), with the Aldgate School glimpsed in the foreground. The proposed building would sit in front of 30 St Mary Axe in this view (View 41), where one would appreciate the stepped form of the proposed building, appearing to mediate in height between the mid-to-high rise buildings in the middle ground, with the much taller buildings in the background, in the cumulative scenario. Despite this intervisibility, as it would form part of the established modern City Cluster, it would not be harmful to its setting or significance. In particular, the proposed building would form a dynamic new terminus to Mitre Street in the background of north-westerly views of the school's western frontage. The GLA have identified a very low level of less than substantial harm to the setting of the Aldgate School; your officers do not agree with this conclusion for the reasons above.

Bishopsgate Institute and Library: grade II*

548. The building is a decorative red brick structure, located prominently on Bishopsgate. Completed in 1895 by Charles Harrison Townsend, the building retains rarity value as a more unusual typology within the city, through its civic and educational function. The use of free gothic elements and terracotta detailing are typically eclectic, making a good example of turn of the century design. The main frontage to Bishopsgate is most elaborate while the longer Brushfield Street elevation is more subdued. The building has high architectural and historic significance.

Setting

549. The building derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings. As the viewer moves northwards views along Bishopsgate towards the institute are oblique, and the two turrets of the main frontage are almost entirely backdropped by 70 St Mary Axe, which is seen as part of the wider City Cluster seen distantly to the south. The site is presently not visible from or with the listed building, making a neutral contribution to an appreciation of its significance.

Impact

550. The GLA has identified a very low, less than substantial level of harm to the significance of this listing building.

551. The proposed building would be visible some distance away as part of the established backdrop of the City Cluster (View 37). This view shows the proposals will be seen in the backdrop of the institute including the top of the northern turret. While this will slightly reduce the extent to which the turret is seen against open sky at this specific viewpoint, the overall contribution of this view to an appreciation of the buildings significance is limited given the distance and oblique angle. Furthermore, the majority of the façade in this view is already backdropped by existing development. Therefore while a small loss of open sky to the rear of the turret is identified, this change is considered to preserve the overall character of the view, and the extent to which it contributes to the building's significance. It is noted more immediate views of the Institute, which best reveal the buildings prominence on the street front, and group value with neighbouring buildings will be preserved. Officers do not agree with the conclusions of the GLA. Accordingly there would be no harm to the setting or significance of the listed building, preserving the extent to which setting contributes to an appreciation of its significance.

38 St Mary Axe: grade II

Significance:

552. The Baltic Exchange has historic interest as an inter-war office building (1922) in the City, designed by Sir Edwin Cooper. This stone-faced building of four storeys with two additional attic storeys illustrates an important phase of office development in the City, characterised by grand, classically enriched stone facades and Classical proportions to St Mary Axe, with a plainer stone elevation to Bury Court.

553. Architectural and artistic interest derives from an appreciation of the Classical style and ornamentation of the building, including a Doric entablature at the ground floor and an enriched frieze and dentil cornice at the fourth floor.

Setting:

554. The setting of the listed building is defined by its prominent corner location, addressing both St Mary Axe and Bury Court. It includes office buildings of similar scale, adjacent to the east and north, and on the west side of St Mary Axe, of a later date that make a neutral contribution to the setting of the listed building.

555. Due to its location in the City Cluster, the setting of the listed building is mainly characterised by large-scale, tall modern commercial buildings that make a neutral contribution to the asset's significance. These include 30 St Mary Axe, directly to the south of the asset, but also the Aviva Tower and 22 Bishopsgate, to the south-east. Additional tall buildings including 70 St. Mary House and 100 Bishopsgate are located to the north and west, respectively.

Impact:

556. In views looking east (View 55), the upper levels of the proposed building would be glimpsed behind and above the listed building, to the left of the Gherkin, slightly infilling the sky gap presently seen above the Baltic Exchange from Clerks Place. Although of a larger scale than other buildings in this tight view, the proposed development would be consistent with the much-altered setting of the listed building which is characterised by tall, modern development. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

557. The GLA have concluded a low-to-middle level of less than substantial harm to the setting of the Baltic Exchange. Officers do not agree with this conclusion for the reasons set out above.

Nos. 2-16 Creechurch Lane: grade II

Significance

558. Nos. 2-16 Creechurch Lane is 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.

Setting

559. The buildings form a group with the other warehouse buildings in the vicinity, of similar age and materiality though unlisted and classed as non-designated heritage assets. The overall architectural and historic significance of the buildings is considered to be high, as a good example of an important and rarer typology in the city context.

560. The proximity of the listed group to St Katherine Cree church to the south and neighbouring Victorian and Edwardian buildings, creates a positive group value along the immediate length of the lane, contributing positively to the listed building's wider setting and enhancing its architectural and historic significance. The setting of this listed building and its unlisted neighbours is also presently characterised by the general proximity of the City Cluster and framed by specific modern buildings such as One Creechurch Place, the Gherkin and 100 Leadenhall Street seen to the north. While the site is visible to the north, its twentieth century architectural character sets it apart from those historic buildings in nearer proximity, lacking an aesthetic or functional relationship. The site therefore presently makes a neutral contribution to the setting of the listed buildings.

561. The GLA has identified a degree of low to middle less than substantial harm to the significance of the listed buildings.

562. The proposed building would be visible in views north along Creechurch Lane (View 46). The design of the facades has sought to create a high-quality architectural addition within these views which its materiality and modelling sympathise to a high degree with the brickwork and terracotta materiality of these historic buildings. While the overall character and scale within the site will change, in view of the site's current neutral contribution, this change is considered to preserve the extent to which these views positively contribute to an appreciation of the buildings' significance. Officers therefore do not agree with the conclusions of the GLA. In this context officer's consider the proposal would not harm the listed building's setting or significance.

563. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

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

Significance and setting:

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

Impact:

565. The listed building is visible in Views 40 and 52 of the THVIA. In View 40, northerly from Lloyd's Avenue, the listed building is only glimpsed in the middle ground. The proposed development would appear to the right of 30 St Mary Axe in this view, directly above the listed building, forming a prominent new element in the background of the listed building in northerly views from Lloyd's Avenue. However, it is read in the background of the listed building as part of the established modern cluster, and the listed building remains legible in short range views along Lloyd's Avenue, from which it derives its significance from its setting. In the cumulative scenario, 100 Leadenhall would appear as much more prominent in the background of this listed building, although offset to the west, infilling much of the sky gap presently seen in the northerly views. In View 52, taken adjacent to the listed building from the west, the proposed development would appear as new built form behind the mid-rise buildings in the middle ground, showing some intervisibility with the listed building.

566. The proposed development would not affect the relationship of the listed building with the historic buildings along Lloyd's Avenue or other positive elements of the setting of the listed building. Due to its distance from the site, intervening buildings and its location in the context of established tall buildings in the wider context of the asset, the proposals be read as part of the modern Cluster distant and disassociated from the listed building. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it. The GLA have identified a low level of less than substantial harm to the setting of the building, but your officers do not agree with that conclusion for the reasons outlined.

Conservation Areas

Lloyd's Avenue Conservation Area

567. This small conservation area has a tightly drawn boundary, comprising the small lane of Lloyd's Avenue, a secondary route located between Fenchurch Street and Crutched Friars. The architectural character is decorative and varied, but largely consistent in date, comprising a number of significant Edwardian and later buildings, which together create a strong group value within the conservation area interior and consistent material palette. The overall architectural and historic significance of the conservation area is considered to be high.

Setting

568. The existing view north up this street terminated by 105 Fenchurch Street and flanked by Lloyd's Register (grade II*) and Dixon House (grade II). Additionally the Gherkin is a distinctive focal point in views along Lloyd's Avenue, which along with the consented 100 Leadenhall Street tower create a modern termination to the view. The conservation area, draws little from its setting, with a strong degree of contrast between the interior and immediate surroundings beyond the lane and junction to the north. The site is presently not visible from the conservation area, making a neutral contribution to an appreciation of the conservation area's significance, character or appearance.

Impact

569. The GLA has identified a low to middle level of less than substantial harm to the significance of the conservation area.

570. The proposals will be visible from the conservation area, seen to the north (Views 40 and 52). The proposed building would introduce elegant faience architecture into this seen as part of an existing backdrop of tall buildings to the north, upholding a high architectural quality and offer a material counterpoint to the existing largely glazed modern towers. Officers disagree with the conclusions of the GLA. Given the characteristic backdrop of tall buildings in this view and the enclosed character of the conservation area, the proposed building would not harm its significance, with no diminishment of the extent to which setting contributes to appreciating this significance.

Trinity Square Conservation Area

Significance:

571. This relatively small conservation area lies to the south of the site, on the border with LB Tower Hamlets, to the north of the Tower of London WHS. It encompasses

buildings around Pepys Street, Seething Lane and Seething Lane Garden, Savage Gardens and Muscovy Street, extending between Hart Street/Crutched Friars to the north, and Byward Street to the south. It comprises a significant group of Georgian and later buildings with strong maritime associations, including Trinity House (Grade I), the Port of London Authority (Grade II*), Hart Street Church of St Olave (Grade I) and the wall and railings to St Olave (Grade II*), which together create a strong group value within the conservation area interior and consistent material palette. The overall architectural and historic significance of the conservation area is considered to be high.

Setting:

572. The conservation area and its buildings share a historic relationship with Trinity Gardens (within the Tower of London Conservation Area in LB Tower Hamlets). They also form part of the local setting of the Tower of London, and form the immediate backdrop to the WHS from the south. The setting of the conservation area to the south contributes positively to its significance. The setting of the conservation area to the north is more varied, including some historic buildings in the Fenchurch Street Station and Lloyd's Avenue Conservation Areas, with the presence of the modern City Cluster of tall buildings visible behind, which create a contrasting scale and character to the Trinity Gardens CA. The setting of the conservation area to the north makes a neutral contribution to its heritage significance. The site is presently not visible from the conservation area, making a neutral contribution to an appreciation of the conservation area's significance, character or appearance.

Impact:

573. In views looking north from Trinity Square Gardens (View 47), located immediately to the south of the conservation area, the upper storeys of the proposed building would appear visible to the east of the Gherkin and above the roofline of the buildings within the conservation area. It would be seen as a new element of the City Cluster between the former PLA building and the grade I listed Trinity House. However, it would be occluded by trees in the foreground, in Trinity Square Gardens, which would provide screening. In the worst-case scenario with the trees not in leaf, and especially in the cumulative scenario, it would appear as an addition to the established City Cluster of modern tall buildings which already forms a prominent backdrop to this view. Given this characteristic backdrop, the proposed building would not harm its significance, with no diminishment of the extent to which setting contributes to appreciating this significance.

574. The GLA have identified a low level of less than substantial harm to the significance of the conservation area through contribution by its setting. Officers disagree with the conclusions of the GLA.

Non-designated heritage assets

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

576. The Rabbi's House adjoins Bevis Marks synagogue to the east and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor detailing. It possesses a high level of historical significance for its associations with the synagogue and a moderate level of architectural significance for its well-composed, high-quality elevations. The building's setting as part of the synagogue complex contributes highly to its significance.

577. 113-116 Leadenhall Street is a stone-built bank of 1891 with refined detailing. As one of few remaining historic buildings on Leadenhall Street, the building is an important element of local townscape and reinforces and contributes to the setting of the church of St Andrew Undershaft. It possesses a moderate level of architectural significance for its high-quality, refined architecture. It forms a group with the Church of St Andrew Undershaft but its setting otherwise contributes neutrally to its significance.

578. 33-34 Bury Street is an office building of 1912, built for Messrs Burge, grain dealers. The building typifies the kind of diminutive, early 20th century office building once very common in the City and now hardly to be seen. It has high-quality stone carved stone detailing and makes a strong local townscape contribution, particularly as a group with Holland House. It possesses a moderate level of architectural and historic significance for its high-quality design and as a now-rare example of this building typology. Its forms a group with Holland House but otherwise its setting contributes neutrally to its significance.

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

good surviving group of a now-rare building type in the City. Their immediate setting as a cohesive group strongly contributes to their significance. Their wider setting is a mix of buildings of various heights and ages which makes a neutral contribution to their significance.

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

581. 30 St Mary Axe (the Gherkin) has been identified as a non-designated heritage asset. Its setting is not considered to be adversely affected by the proposal, a high-quality tall building which would be commensurate with the Gherkin's existing character and positioned and designed in such a way as to form a complimentary neighbour to it.

Other Heritage Assets

582. Setting of a heritage asset is defined in the NPPF as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. Section 8 of the Heritage, Townscape and Visual Impact Assessment (ES Volume 2) explains which heritage assets were scoped in and out of the assessment. The designated heritage assets considered by officers were:

- 38 St Mary Axe
- 20 & 21 Billiter Street
- Front block of Fenchurch Street Station
- Sir John Cass College
- Gatepiers at entrance to Port of London Authority's warehouses
- House east of entrance to Port of London Authority's warehouses
- Pair of houses to north of entrance to Port of London's Authority's warehouses
- 139-144 Leadenhall Street
- 52-68 Bishopsgate
- 48 Bishopsgate
- 46 Bishopsgate

- Guild Church of St Ethelburga the Virgin
- Lloyd's Building, listed Grade I and the associated Nos 12 and 14-19 Leadenhall Street, listed Grade II
- Port of London Authority Buildings including warehouses, house and pair of houses, listed Grade II
- Nos 139 to 144 Leadenhall Street, listed Grade II
- Nos 46, 48 and 52-68 Bishopsgate, listed Grade II
- Nos 20 and 21 Billiter Street, listed Grade II
- Front block of Fenchurch Street Station, listed Grade II
- Sir John Cass College (now David Game College), Jewry Street, listed Grade II
- Fenchurch Street Conservation Area

583. Officers have considered the potential impact on these designated heritage assets. Officers have also scrutinised all of the designated heritage assets using the THVIA and a digital model. The report has only assessed in detail in those listed buildings where, in the expert view of officers, there is expected to be any meaningful physical or visual proximity and/or intervisibility between the asset and the proposed development and thus a potential impact.

584. The settings and the contribution they make to the significance of the heritage assets which were scoped out of detailed assessment, would not be affected by the proposals due to the level of influence the proposals in question would have over the setting of the assets in question. It is the view of Officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. The assets assessed in detail in this report are those affected by the proposed development. Officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the THVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

Conclusion on Strategic Views and Heritage

585. The proposal would preserve the OUV/significance of the Tower of London World Heritage Site in accordance with London Plan policy D9m HC2, HC3, HC4, Local Plan policies CS12, CS13

586. The proposal would preserve the characteristics and composition of all relevant strategic views.

587. The proposal would cause a low level of less than substantial harm to the significance of Holland House through the infilling of the upper levels of the atrium. The proposal would also result in a low level of enhancement to Holland House through various works of repair, reinstatement and re-presentation. There would be a minor enhancement to the ability to appreciate significance through the broadening of access to the building.

588. There would be a low level of enhancement to the Creechurch Conservation Area through the creation of Heneage Arcade.

589. As such, the proposals would fail to preserve the special architectural and historic interest of Holland House as a listed building and lead to conflict with Local Plan policies CS12, DM12.1, DM12.3, emerging City Plan policies S11, and London Plan policy HC1.

590. The proposal would otherwise preserve the settings and significance of all other heritage assets assessed

591. The low levels of harm and enhancement highlighted above are carried forward into the paragraph 208 balancing exercise set out below.

Archaeology

592. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and the conservation of archaeological interest is a material planning consideration. Paragraph 200 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

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

594. 760 The application is accompanied by an archaeological desk-based assessment (AOC Archaeology, July 2023) which is contained within the Environmental Statement as an Appendix.

595. The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.

596. The desk-based assessment has indicated a low potential for surviving Roman and medieval features within the site. It is acknowledged that there is evidence of activity during these periods on the site, however it is stated that the impact of successive brickearth extraction and redevelopment within the site has likely had an adverse impact upon earlier archaeological remains. Notwithstanding, the presence of remains cannot be wholly discounted, and truncated remains may survive and that dependant on the extent of truncation, they'd likely be considered of "Medium" importance.

597. The highest potential for direct impacts results from the proposed basement extension beneath Bury House, which would extend for four levels (two additional levels below existing) and would therefore result in complete truncation of any surviving remains.

598. The proposals at Holland House and Renown House are less likely to have an impact due to them not extending beyond the existing basement levels, however, works associated with the new crane base and foundations, as well as propping up and underpinning have the potential to impact upon archaeological remains.

599. It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings.

600. Historic England GLAAS have advised that the proposed development would have a high impact on these potential remains. It is recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented.

601. As a cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. It is

noted that the story of Holy Trinity Priory is of particular interest as little information about this site is currently available to view within the City.

602. Although the NPPF envisages evaluation being undertaken prior to determination, in this case considering the nature of the development, the archaeological interest and/or practical constraints are such that Historic England consider a archaeological conditions could provide an acceptable safeguard. This would comprise firstly, of evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

603. In addition, a condition requiring a detailed design and method statement for foundations and piling configuration, as well as for public engagement is also recommended.

604. Subject to compliance with the recommended conditions, the proposals comply with the required initial steps of archaeology investigation Local Plan Policy DM 12.4, emerging City Plan 2040 HE2, HE1 and London Plan HC1.

Public Access and Inclusivity

Accessible and inclusive design

605. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

606. London Plan policy D5 3.5.3 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An inclusive design statement has been provided. The proposals were subject to review by the City of London Access Group (CoLAG) on 12th January 2024.

Arrival and departure

607. The site is well-served by public transport, noting that public transport is not accessible to all people. The nearest station providing step-free access is Tower Hill at 600 metres away from the site and the nearest bus stop is 150m away from the site, on St Katherine Cree, albeit it is noted that buses are not suitable for all people.

Parking

608. Whilst there is a high PTAL, step-free public transport routes to the site are significantly further away than the recommended 50m from principal entrance points as set out in Inclusive Mobility and British Standard BS 8300 (1). Accordingly, disabled people may require access to parking, or drop-off at the site. Details of rest points at 50 metres intervals and dropping-off are reserved through the Travel Plan and S278.

609. The Red Badge parking scheme is for disabled residents and workers in the City. Red Badge holders may park in pay and display and disabled persons parking bays in the City without time limits. Blue Badge holders may park for up to four hours in these bays and six hours in the bays nearest to St Bartholomew's hospital. Therefore, disabled people who hold a Blue Badge, but not a Red Badge, are limited to four hours of on-street parking. London Plan T6.5 states that for non-residential uses that 'at least one on or off street' disabled persons parking space is provided. Following negotiations with the Applicant a blue badge parking bay has been incorporated within the designated servicing bay. This should be reserved for use for free by the disabled persons parking bay only between the hours of 7.00am and 11.00pm for the life of the development. Details of controlled entry and use of the space, its layout and surface are reserved by condition. Arrangements for booking the space and its management are reserved as part of the Inclusive Access Management Plan.

610. There are three existing on-street disabled persons parking bays in the vicinity of the development which should be re-provided if any are affected during the construction period and details reserved through the Construction Management Plan.

Dropping-off

611. Good practice guidance is that setting-down points should be positioned close to the accessible entrance of a building on firm and level ground. No drop-off points are identified in the proposals. It is recommended that details of secure drop-off on firm and level ground are reserved by condition and secured through Section S278 works.

Cycle parking

612. Cycle parking should accommodate a range of people, so as not to exclude or disadvantage riders of certain types of cycle. London Plan policy and London Cycle Design Standards recommend that 5% of cycle spaces should be suitable for larger cycles with associated, and appropriately-sized lifts and end-of-trip facilities. The 5% should be spread across both short and longer stay spaces. Routes to cycle parking should include no more than two sets of doors and those should be automated.

613. The application states that 5% of spaces for larger cycles will be provided. Larger cycle storage spaces are provided at level B1 and Lower Ground Floor, accessed by a stepped entrance with cycle ramp or a cycle lift from the northern end of Heneage Arcade. The cycle lift is dual purpose, shared with refuse transfer. There is larger cycle parking at the southern end of the Lower Ground Floor which is not accessible by lift by larger and adapted cycles. It is recommended that details of accessible cycle parking, including controlled points of entry, swept paths, and end of trip facilities are reserved by condition in the Travel Plan to ensure that all spaces are easy to access and are consistent with LCDS.

614. Larger cycle storage is at B1 or Lower Ground Floor. Cyclists will move between levels from the cycle storage via lifts A and F to access end of trip facilities on level B2. Cyclists requiring step-free routes will transfer from the cycle lift, put the cycle into storage and then move across to the passenger lifts in the central lift lobby. The cycle lift allows access to B2 but connects directly into the refuse store. Details of how this lift will be managed and cleaned are reserved by condition through the Inclusive Access Management Plan to maintain independent and dignified access and avoid inadvertent access to the refuse store. No mobility scooter storage charging or storage points have been shown in the submitted plans; however, provision of both would be secured by condition.

615. It is recommended that passive EV charging should be provided for all larger cycle spaces and details reserved through the Travel Plan.

Entrances

616. Guidance in the London Plan is that entrances should be easy to identify and accessed without undue effort, special treatment or separation. Automated sliding doors are proposed to principal entrance points, and for which step free access is provided. Step free access routes and sliding doors are welcomed. Sliding doors are more inclusive of a range of people than revolving doors, which reinforce separation and are not considered inclusive.

617. A new arcade will be created which will improve the permeability of the site. Some of the retails units are shallow and may not have sufficient passing or turning

space for wheelchair users. Details of all shopfronts are reserved by condition to ensure that doors are of sufficient width and have suitable door furniture and surface contrast.

618. Reception facilities should be consistent with AD M(2) 3.6 and include facilities for both standing and seated visitors, have non-slip surfaces, lowered sections of any desks, options for seating and an audio induction loop. As these are not currently shown on the drawings details of reception facilities are reserved by condition.

Vertical access

619. London Plan 2021 Policy D5 requires that at least one lift per core is a fire evacuation lift suitably sized for step-free access out from the building in addition to fire-fighting lifts. Two evacuation lifts are identified in the central lift core, with separate firefighting lifts.

620. Details of the management protocol for assisting people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition through the IAMP to ensure that there is sufficient training and awareness as part of the building's management.

621. Reference is not made to the use of Easy Access to Historic Buildings. However, the proposals would bring greater access to the listed buildings, which is welcome in principle. The Statement of Community Involvement indicates that some relevant disabled persons user groups were engaged during project development.

Culture/education space

622. An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

Sanitary facilities

623. Policy in the London Plan and Local Plan requires free, publicly accessible toilets for a range of people where there is major development, particularly when they are near significant attractions, public open spaces or existing transport

interchange. Sanitary facilities will need to meet standards in both Approved Documents M and, the updated, T.

624. Changing Places toilets are a requirement of Building Regulations for certain types and/or scales of development. The criteria are set out in Approved Document M of the Building Regulations. Changing Places toilets are intended for people with multiple and/or complex impairments. They are not intended for independent use. A 'Changing Place' toilet is indicated on the proposed drawings, accessed from Heneage Arcade. This is not currently shown fitted out as a Changing Places toilet.

625. Under the requirements of current Building Regulations and relevant policy, separate wheelchair accessible toilet and baby changing facilities should also be provided as well as ambulant accessible toilets. Whilst indicative layouts show some scope for inclusive toilet provision this needs further development, and an Inclusive Toilet Strategy is recommended to be reserved by condition encompassing the whole development. Signage and wayfinding would be secured by condition to direct the public to those facilities.

Landscape

626. Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.

627. Spend areas for assistance animals are not currently identified but could be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

Public Access and Inclusivity Conclusion

628. Overall, and subject to the imposition of conditions, S106 and S278 obligations, the proposal would accord with the access policies outlined above.

Highways and Transportation

Surrounding Highway Network and Site Accessibility

629. There is an established network of footways in the area immediately surrounding the site, with footways provided along each of the adjacent roads.

630. To the south, the site is bounded by Bury Street, which operates a one-way system from a south to north direction and connects to Leadenhall Street and Bevis Marks respectively. Pedestrian footways are provided on both sides of the carriageway.

631. The east of the site is bound by Creechurch Lane, a one-way street for northbound traffic only, which connects to Leadenhall Street in the south and Bevis Marks in the north. There are footways present on both sides of the carriageway along this street. A section of Creechurch Lane is pedestrian only, providing walking links to Bevis Marks and Houndsditch when heading northeast. Heneage Lane is another pedestrian only walkway which runs parallel to Creechurch Lane, providing access to Bevis Marks.

632. Bury Street runs along the south-west and north-west perimeter of the site. Part of the east of the site is bound by Bevis Marks. Both Bury Street and Bevis Marks are one-way streets, with footways on both sides of the carriageway.

633. There is only one signalised pedestrian crossing located in close proximity to the site, which provides a safe crossing location. It is located on Bevis Marks, which allows pedestrian movement along the pedestrianised sections of Creechurch Lane, moving in a southwest to northeast direction.

634. The surrounding road network enables pedestrians to travel directly to and from the site and permeate through the City to public transport nodes and other destinations. The site is within close proximity of Bank, Aldgate, Liverpool Street, Monument, Aldgate East and Fenchurch Street stations.

635. These stations provide access to various services on the Underground, DLR and National Rail networks.

636. The site is therefore considered well located (PTAL of 6B) to enable and encourage sustainable trip making in accordance with policy T1 of the London Plan which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

637. Regarding step free access, step free is available at Liverpool Street/Moorgate stations (Elizabeth Line, Circle, Hammersmith & City and Metropolitan Line) and Bank station (Northern Line and DLR)

Trip Generation

638. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

639. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 to 18:00 for the PM peak.

640. The predicted impact of the trip generation and the impact of the new development on the transport network is summarised from extracts of the Transport Assessment (TA) in Table 6.10 and 6.11. These represent the total proposed development trip generation and net trip generation for the total development.

Table 6.10: Total Proposed Development Trip Generation

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	0	0	0	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0	0	0	0
Bus	63	4	68	8	59	67	279	272	552
National Rail	434	30	464	56	402	459	1916	1868	3784
London Underground	298	21	319	39	277	315	1317	1284	2602
Taxi	9	1	10	1	8	10	40	39	79
Motorcycle	9	1	10	1	8	10	40	39	79
Bicycle	45	3	48	6	42	48	200	195	394
Walk	45	3	48	6	42	48	200	195	394
Other	0	0	0	0	0	0	0	0	0
Total	903	63	966	117	838	955	3992	3892	7884

Table 6.11: Total Development Net Trip Generation

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	-13	-1	-14	-1	-12	-13	-54	-52	-106
Car Passenger	0	0	0	0	0	0	0	0	0
Bus	48	3	51	7	44	51	215	210	425
National Rail	314	22	336	44	290	334	1412	1376	2787
London Underground	216	15	232	30	200	231	974	949	1923
Taxi	6	0	7	1	6	7	29	28	58
Motorcycle	6	0	7	1	6	7	29	28	58
Bicycle	35	2	37	5	32	37	157	153	309
Walk	32	2	35	5	30	35	146	142	288
Other	0	0	0	0	0	0	0	0	0
Total	**646**	**45**	**691**	**91**	**597**	**688**	**2908**	**2834**	**5742**

641. The net development trip generation of 691 total trips in the 08:00 – 09:00 AM peak, 688 total trips in the 17:00 – 18:00 PM peak and 5,742 daily total trips are considered acceptable, given the scale of the proposals and the fact that the majority of these trips will be done via walking, cycling and public transport, with no adverse impacts on the network and immediate surrounds. The permeable nature of the site featuring Creechurch Lane and Heneage Lane as key pedestrian routes through the site is advantageous.

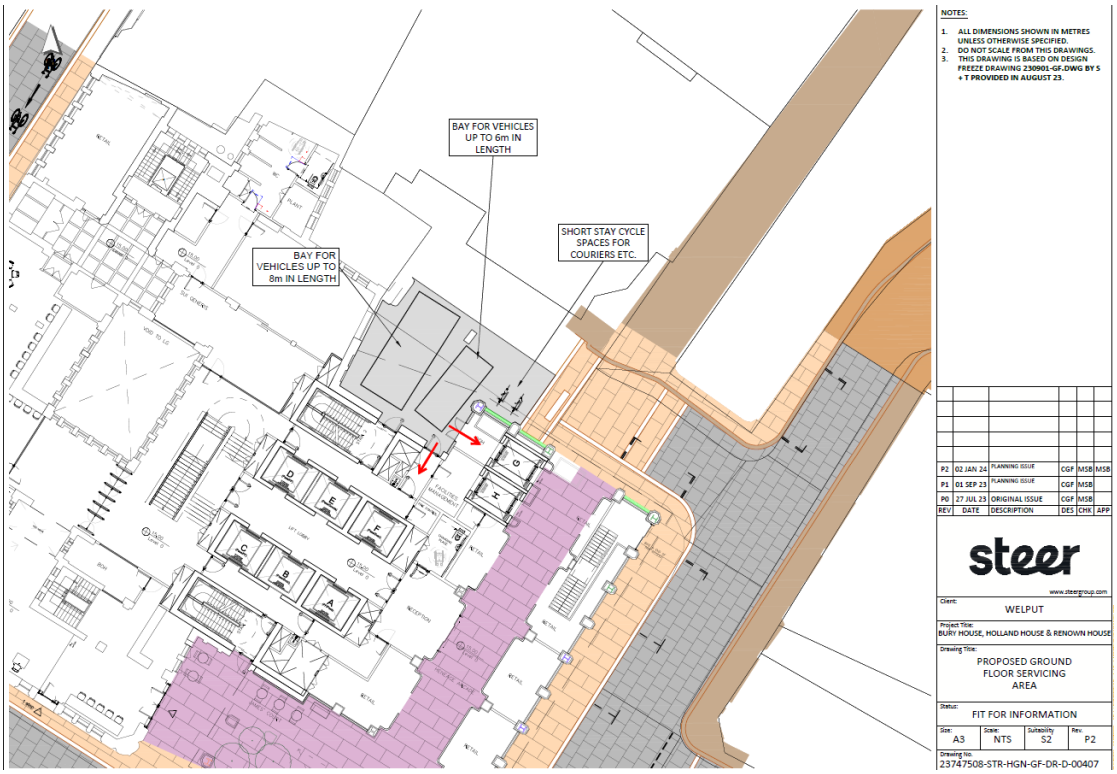
Trip Generation - Servicing and Delivery

642. The servicing area for the proposed development will be located off-street via Heneage Lane. This will serve Bury House, Holland House and Renown House.

643. Servicing area access points would be set back from the highway to ensure an arriving vehicle has place to wait off the highway to prevent any congestion/ delays to pedestrians, cyclists and other vehicles. The motorcycle parking bays on Heneage Lane once reinstated will be adjusted to allow access to the proposed off-street servicing area, and will not interfere with a new through-route via the proposed Heneage Arcade, publicly accessible from 7am to 11pm. If identified during detailed design of the S278 works, that the current location of the

motorcycle parking bays pose a threat to road safety, a relocation might be considered.

644. One fully dedicated loading bay is proposed to accommodate the maximum servicing demand per hour of the proposed scheme. This loading bay will operate alongside one adjacent hybrid loading bay/ blue badge bay, as part of the developments requirement to provide on-site disabled parking. This is demonstrated in the drawings below.



645. A ‘Dockmaster’ will be employed to manage the servicing area. Using the vehicle management system, they will ensure that delivery slots are honoured and that they will be managed and monitored to eliminate or minimise loading and unloading times, and service vehicles waiting times. Following arrival to the servicing area, the ‘Dockmaster’ will review the booking/delivery note, with the vehicle then allocated to a loading bay where goods will be unloaded.

646. The blue badge bay adjacent to the loading bay will act as a secondary loading bay, in the event that it is not used and if there are no requests to park there during the day. This flexible arrangement will be fully managed by the on-site facilities management (FM) team.

647. In the event that the blue badge bay is occupied, delivery slots could still be allocated over the course of the day, but more deliveries could be received later in the early evening once the blue badge bay user has departed the office. An indicative example of deliveries made over the course of the day, if the blue badge bay is presented in the table below.

Typical Day	
8 x 15 minute delivery slots per hour provided by two bays	
Time	Predicted number of deliveries
06:00:00	4
07:00:00	0
08:00:00	0
09:00:00	0
10:00:00	8
11:00:00	7
12:00:00	0
13:00:00	0
14:00:00	7
15:00:00	7
16:00:00	0
17:00:00	0
18:00:00	0
19:00:00	0
20:00:00	0
21:00:00	0
22:00:00	0
Total	33

Alternative Day	
4 x 15 minute delivery slots per hour provided by one bay	
Time	Predicted number of deliveries
06:00:00	4
07:00:00	0
08:00:00	0
09:00:00	0
10:00:00	4
11:00:00	4
12:00:00	0
13:00:00	0
14:00:00	4
15:00:00	4
16:00:00	0
17:00:00	0
18:00:00	0
19:00:00	4
20:00:00	4
21:00:00	3
22:00:00	2
	33

648. The proposed servicing trip generation was based on the following assumptions:

- Class E Office – Daily trip rate of 0.21 vehicles per 100sqm Net Internal Area (NIA)
- Class E Retail – Daily trip rate of 2.00 vehicles per 100sqm NIA
- Sui Generis – Daily trip rate of 0.5 vehicles per 100sqm NIA

649. The proposed servicing trip generation analysis anticipates a total of 33 vehicle trips servicing the site per day, including refuse vehicles and facilities

management. To ensure clarity, trips are defined as both the arrival and departure of the vehicle.

650. Part of the assumptions in producing the vehicle trip generation was establishing the percentages of vehicle type that would be used to service each use class. This is summarised in the table below.

Land Use	Floor Area (NIA)	Daily Vehicles			Maximum Vehicles per hour
		MGV	Car/ Vans <4.6T	Total	
Class E Office	24,258	9.7	38.8	48.55	4.86
Class E Retail	478	0.96	8.6	9.56	1.9
Sui Generis	1,298	1.62	4.9	6.4	0.66
Total	26,034	12	52	64.6	7.4

651. A consolidation strategy for the scheme calculated a reduction in the number of deliveries by 50%. Therefore, a maximum of 33 daily delivery and servicing trips were forecast for the scheme. This number remains the same for the current proposals.

652. The scheme provides that no deliveries would be undertaken during the CoL peak network times, as follows:

- AM peak period (07:00-10:00);
- Lunchtime peak period (12:00-14:00); and
- PM peak period (16:00-19:00).

653. Policy VT2: Freight and Servicing states Developers should minimise congestion and emissions caused by servicing and deliveries. The City supports deliveries made by cycle and low emission modes such as cargo bikes, and it is encouraging to see allocated provision for two Sheffield stands, so that cargo bikes could park up, and unload any deliveries.

654. To conclude, it is recommended that a S106 obligation be secured, to ensure the delivery management system is used effectively, that delivery slots are honoured and that deliveries are made where possible, via sustainable delivery modes as discussed.

655. An additional condition is recommended to restrict the size of the vehicles for delivery and servicing, to no larger than 9m in length.

656. A full Delivery and Servicing Management Plan will be secured via condition, which will provide full details on the receiving of deliveries, and the method & management of refuse collection.

Pedestrian Comfort Level's (Pedestrian Footway Assessment)

657. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experience on the street.

658. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc.)

659. Pedestrian Comfort Levels are graded A+ (Comfortable) to E (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.

660. A PCL assessment has been undertaken on key footways and crossings within the local area based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.

661. A Pedestrian Comfort Level (PCL) assessment and a pedestrian movement forecast were carried out. A pedestrian flow survey was conducted on Wednesday 7th to Saturday 10th June 2023. The results of the survey were then used to establish a baseline pedestrian flow.

662. The PCL assessment was carried out for two weekday peaks: 08:00 to 10:00 and 16:00 to 19:00. 13 points of observation points were surveyed. For this analysis, PCL for links with a total width below 1.9, (clear width below 1.5m) were automatically classified with a PCL of F based on the assessment criteria.

663. In the PCL assessment, analysis showed that 8 of the 13 tested locations within the site boundary and adjacent highways are within PCL B+ which is the target set by the City. Locations 1 and 4 on Bury Street, 6 and 7 on South Creechurch Lane and 9 on Upper North Creechurch Lane, are below the target of PCL B+ during all

peak periods, and therefore having no adverse impacts on pedestrian comfort levels.

664. The pedestrian movement forecast provides an estimated pedestrian flow for each direction, as a percentage expressed as a flow ratio. This estimates the total percentage for pedestrians using links between the North of the site at 53.5%, 28.8% to the West, 13.0% to the South and 4.7% to the East.

665. The additional peak hourly flow for each direction resulted in 349 extra walking journeys to the North, 188 to the West, 85 to the South and 31 to the East.

666. The results of the pedestrian comfort study demonstrate that the net uplift in walking trips expected can be, from a pedestrian comfort perspective, satisfactorily accommodated via the proposed pedestrian network and highways interventions.

Cycle Parking

667. London Policy T5 Cycling requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

668. The tables below shows that this proposal is compliant with the policy in terms of overall number of the proposed cycle parking spaces, as well as the parking split of the long stay cycle parking spaces.

London Plan Requirement		**Proposed**	
Long Stay	Short Stay	Long Stay	Short Stay
582	85	582	85

Use class	**GEA Area (sqm)**	**London Plan Standard**	**Long Stay**	**London Plan Standard**	**Short Stay**
Class E Office	43,206	1 space per 75 sqm	577	first 5,000 sqm: 1 space per 500 sqm	18

				thereafter: 1 space per 5,000 sqm (GEA)	
Class E Retail	851	1 space per 175 sqm	5	first 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA)	43
Sui Generis	2,312		N/A		24
Total	46,369		582		85

Long Stay Cycle Spaces – parking split				
Sheffield Stands (2 spaces per unit)	Accessible Sheffield Stands (2 per unit)	Folding bike lockers (1 per unit)	Other high-density solutions (1 per unit)	Total long-stay spaces provided
87	29	58	407	582

669. Long-stay cycle parking will be provided in the basement B1 and B1 Mezzanine, with cyclists being able to access the basement from ground level via stairs and a wheeling channel.

670. Long-stay cycle parking access will be via Creechurch Lane at the north east corner of the site. The dedicated cycle entrance is separated from the pedestrian entrance and is equipped with a sliding door and stairs.

671. An alternative access for cycle parking is provided via the eastern Holland House entrance, from James Court via lift or stairs.

672. Short-stay cycle parking for all users has been provided within the building. It is proposed that the visitor parking will be compliant with London Plan standards. The 85 required short stay cycle parking spaces will be located within basement level B1 and B1 mezzanine level, accessed via the Creechurch Lane cycle

entrances. No short stay/ visitor cycle parking spaces are provided within the public realm surrounding the development.

673. The new development will offer changing and showering facilities (located at basement B2) for use by all staff and building occupants, this will be of particular use to those travelling by cycle and other active travel modes.

674. The proposed development will provide a minimum of 1 shower per 10 long-stay cycle parking spaces, equating to 59 showers. The London plan recommends shower facilities (at least one per ten long-stay spaces). However, due to the size of the proposed development it is unlikely that all of showers will be in use at all times therefore a degree of flexibility is applied, and the proposed provision is considered acceptable in principle.

675. The proposed development will provide 582 locker spaces in the shower rooms. The changing facilities will ensure that cyclists have access to a private space where they can change before and after working and separate from their workspace facilities. The London Plan recommendation for lockers is at least two per three long-stay spaces. The provision is considered acceptable.

676. There are currently plans for cycle repair stations to be provided within parking areas to allow cyclists to service their bikes. Such stations will provide essential tools to allow for repairs to be undertaken much more efficiently and with ease for a wider range of users.

677. In conclusion, the policy requirement on cycle parking have been met. A recommendation for condition to secure 582 long stay cycle spaces and 85 short stay cycle spaces, along with the provision of accessible changing facilities is required, to ensure accessibility requirements are met.

Refuse Management/Waste Strategy

678. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing.

679. For the proposed development each of the commercial tenants will be required to comply with the Site's Waste Management Strategy and may bring their own waste to the allocated refuse stores within the basement, the dedicated refuse collection store at basement or could arrange for waste to be collected regularly by the facilities management (FM) team.

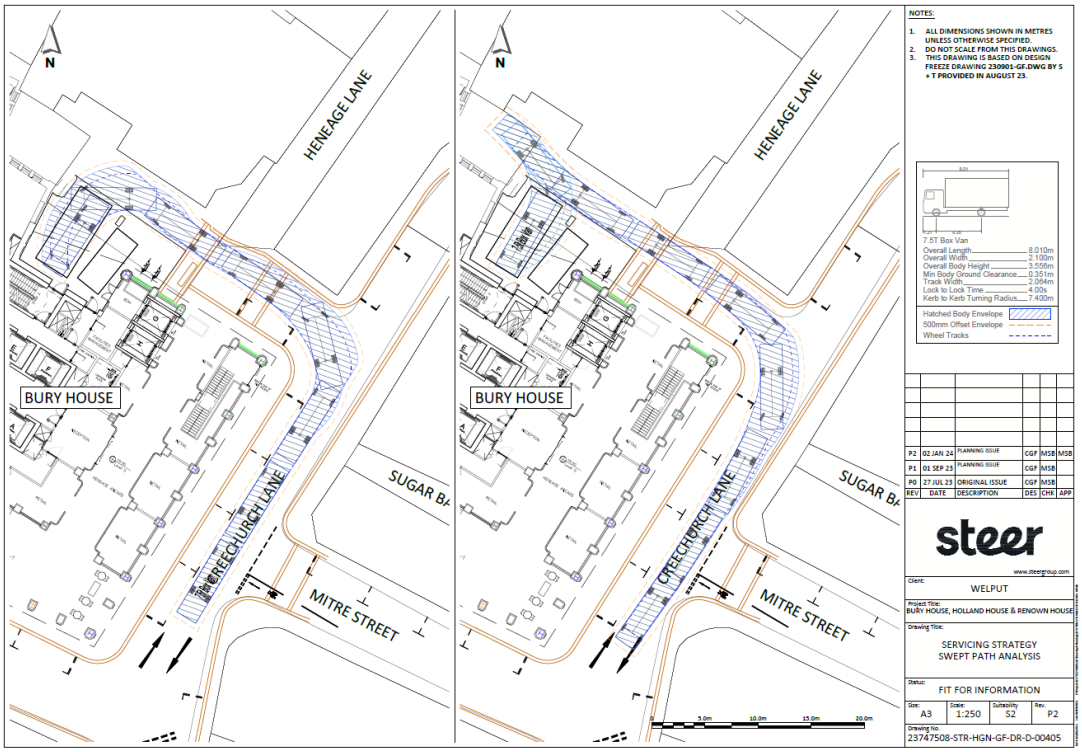
680. In addition to the containers for refuse and recyclables, producers of large quantities of glass, organic waste, waste food oil and other dry mixed recyclables will be required to provide additional separate containers for these waste streams.

681. At regular intervals the tenants' staff or their FM contractor will transport their segregated waste and refuse from the shared waste store at Basement Level 2 to the main off-street loading bay off Heneage Lane. The details of vehicle collection and specification are to be submitted for further consideration via condition.

682. It is acceptable for refuse collection to be carried out by private waste collection companies and will ensure this takes place in the off-street servicing area. It is anticipated that the vehicles utilised will be approximately 8m in length or the equivalent of a 7.5T box van.

683. The swept path analysis for a 7.5T box van is considered acceptable, ensuring that facilities management staff are on hand to guide with an internal reverse manoeuvre. This is to ensure the vehicle can depart in forward gear, departing in reverse from the loading bay onto the highway is not accepted

684. To conclude, the proposals for refuse collection comply with City Plan policy S9: Transport and Servicing, due to the provision of on-site servicing facilities and encouragement of deliveries by bicycle and cargo bike.



685. The Corporation's Community Facilities Manager has been consulted and advised that the proposed waste and storage collection facilities indicated on

drawings no. 4458-ST-PR-02-100 & 4458-ST-PR-02-097 and in the Delivery and Servicing Plan, Jan 2024, comply with their requirements.

686. A full Delivery and Servicing Management Plan will be secured via condition, which will provide full details on the receiving of deliveries and will include a Waste Management strategy detailing the method & management of refuse collection.

Travel Plans

687. With an expected uplift of over 5,500 trips generated from this proposed development, steps should be taken to mitigate the impact on this development by requesting a Workplace Travel Plan be put in place; this will not be required to cover the retail areas of the site as it does not meet thresholds to be needed. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

688. If planning permission is granted a Workplace Travel Plan would need to be secured as a section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

Car Parking

On-site

689. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons parking for Blue Badge holders are to be provided in accordance with Policy T6.5 for Non-residential elements of the development.

690. The proposals would be ‘car free’ with the exception of one on-site disabled parking bay, located within the servicing area. The parking bay due to site constraints, only has the full 1.2m clearance on the driver side and rear of the parking space.

691. A car-free development has no general parking but still must provide disabled persons parking, in line with the aforementioned policy. In order bring this proposal fully in line with the policy a Travel Plan (TP) has been recommended, to be secured via the Section 106 Agreement.

692. The foundation of the TP is supporting disabled people of this development through different measures. Each disabled staff member to have a tailored travel plan, on how to get to/from this site, and supported through different initiatives. The foundation of the TP is to support the inclusion of disabled people.

693. Similarly, disabled visitors of this development, could request support to get to/from the site, if the public transport is lacking to meet their needs.

694. Not all London Underground (LU), nearby stations are step-free access, thus some users of this development may require additional support, such as: arranging a pickup from a nearby LU station which has step-free access or at a pre-arranged location

695. The TP must also monitor the demand for on-street car parking spaces coming from this development. If records show that demand is higher than the available spaces nearby, the developer will be required to provide additional travel plan measures to support the needs of the disabled users of this development.

696. The Travel Plan (TP) is required to monitor the demand for the disabled car parking spaces and to encourage the use of public transport through travel planning measures.

Off-site

697. There are three disabled parking bays on Creechurch Lane and Mitre Street that are located in close proximity to the building entrances as per the requirements of the London Plan T6.5 and the Draft City Local Plan 2040.

698. Car-free development can in some cases lead to parking displacement on the surrounding highway network. However, the whole of the City of London is covered by a controlled parking zone, (CPZ) active Monday to Friday from 0700-1900 and Saturdays from 0700-1100. During these times motorists must pay to park in pay and display bays and must not park on single or double yellow lines. When different times apply, signage displays the controlled parking hours for specific locations.

699. Office workers and visitors are expected to travel via sustainable modes of transport. There are existing parking restrictions within the area and it is acknowledged by the City, that a robust enforcement will be required in the area to prevent illegal parking and obstruction of the highway.

Oversailing & Undersailing

700. No oversailing and undersailing have been identified at this stage, as part of the planning submission.

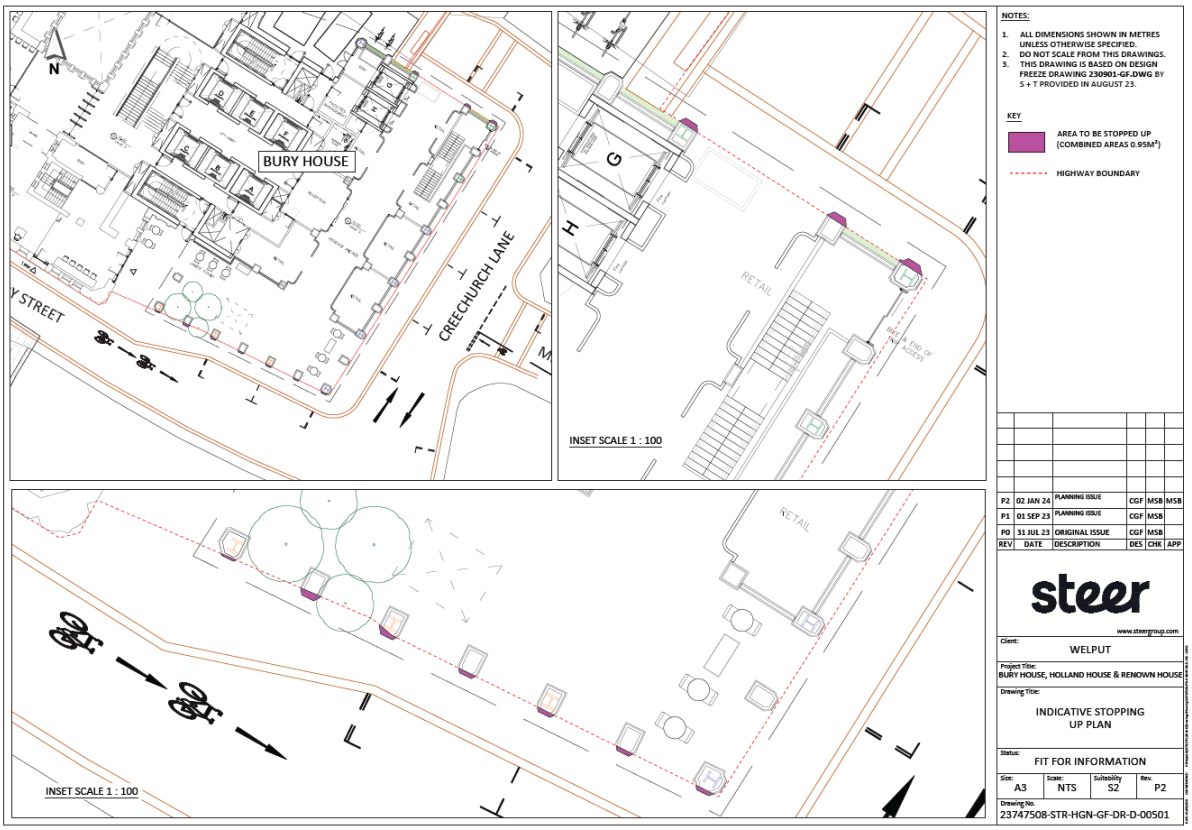
Highway Boundary/Stopping Up and Adoption

701. As the highway authority the City of London has the power to stop up areas designated as highway land by making orders known as a 'stopping up' order. The term 'stopping up' means that once such an order is made, the highway land ceases to be a highway, road, or footpath i.e. the highway rights are extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorizing the stopping up or diversion of a highway if it is satisfied that it is necessary to do so in order to enable development to be carried out. That process would be carried out under separate procedures to considerations of the applications currently before you.

702. Areas of privately owned land can alternatively be ‘offered up’ for adoption as public highway, for instance for the creation of a new ‘estate road’ to be adopted and maintained by the local authority.

703. As a result of the proposals, sections of the highways within the vicinity of the site will need to be stopped up, reconstructed and eventually adopted with areas to be dedicated as public highway. The area to be stopped up is approximately 0.95m2 and the area to be adopted is 2.7m2.

704. The draft stopping up / public highway offering plan, was produced by the applicant and is shown below, which illustrates the proposed changes. The plan is preliminary and will be subject to further refinement in consultation with the City’s Highways Authority, following any planning approval. The process to formalize stopping up orders can only be made at the appropriate point. In principle, the plan with reference 23747508-STR-HGN-GF-DR-D-00501 is considered acceptable, as well as the plan reference 23747508-STR-HGN-GF-DR-D-00502 for highways adoption is considered acceptable.


BURY HOUSE
CREECHURCH LANE
RETAIL
INSET SCALE 1 : 100
INSET SCALE 1 : 100
NOTES:
1. ALL DIMENSIONS SHOWN IN METRES UNLESS OTHERWISE SPECIFIED.
2. DO NOT SCALE FROM THIS DRAWINGS.
3. THIS DRAWING IS BASED ON DESIGN FREEZE DRAWING 230901-GF.DWG BY S + T PROVIDED IN AUGUST 23.
KEY
AREA TO BE STOPPED UP (COMBINED AREAS 0.95M²)
HIGHWAY BOUNDARY
P2 02 JAN 24 PLANNING ISSUE CGF MSB MSB
P1 01 SEP 23 PLANNING ISSUE CGF MSB
P0 31 JUL 23 ORIGINAL ISSUE CGF MSB
REV DATE DESCRIPTION DES CHK APP
steer
www.steergroup.com
Client: WELPUT
Project Title: BURY HOUSE, HOLLAND HOUSE & RENOWN HOUSE
Drawing Title: INDICATIVE STOPPING UP PLAN
Status: FIT FOR INFORMATION
Size: A3 Scale: NTS Suitability S2 Rev. P2
Drawing No. 23747508-STR-HGN-GF-DR-D-00501


RECEPTION
HENEAGE ARCADE
RETAIL
NOTES:
1. ALL DIMENSIONS SHOWN IN METRES UNLESS OTHERWISE SPECIFIED.
2. DO NOT SCALE FROM THIS DRAWINGS.
3. THIS DRAWING IS BASED ON DESIGN FREEZE DRAWING 230901-GF.DWG BY S + T PROVIDED IN AUGUST 23.
KEY
AREA TO BE OFFERED TO ADOPTION (AREAS 2.7M²)
HIGHWAY BOUNDARY
P0 29 NOV 24 ORIGINAL ISSUE MSB JDC MSB
REV DATE DESCRIPTION DES CHK APP
steer
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Client: WELPUT
Project Title: BURY HOUSE, HOLLAND HOUSE & RENOWN HOUSE
Drawing Title: INDICATIVE ADOPTION PLAN
Status: FIT FOR INFORMATION
Size: A3 Scale: 1:100 Suitability S2 Rev. P0
Drawing No. 23747508-STR-HGN-GF-DR-D-00502

Section S278/38 - Highways Works

705. The proposed development will attract a substantial number of pedestrians within the area.

706. It is acknowledged that meaningful changes are ongoing in the area due to the construction of tall buildings. Therefore, an increase in pedestrian flows will be able to be accommodated within the existing footways, with no adverse impacts to the surrounding area.

707. The highways works necessary to mitigate the impact of the development (including post-construction), will be carried out as part of a Section 278/38 Agreement under the Highways Act 1980.

708. The proposed works within the adjacent highways of the planning application site are (and not limited to):

Creechurch Lane

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Removal of redundant vehicle crossing
- Improvements to highways drainage
- Provision of road markings and associated traffic orders
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Bury Street

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Improvements to highways drainage
- Provision of road markings and associated traffic orders
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Heneage Lane

- Reconstruction and raising of the footway, as per the City's approved materials
- Removal of redundant street furniture
- Improvements to footway drainage
- Provision of greenery

Mitre Street Junction with Creechurch Lane

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageway

Construction Logistics Plan (CLP)

709. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

710. The detailed plans to be developed in accordance with TfL guidance and latest standards and approved by CoL prior to the start of the construction of this development.

711. A preliminary Construction Logistics Pan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which will need to be in line with TfL's Construction Logistics Plan Guidance and outlines the initial method

712. This should consider the following points:

- Expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highway licenses would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.
- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.

713. Full details of the CLP to be submitted and agreed prior to start of construction phase. Temporary works will be required to be implemented on the public highway and subject to approvals.

714. Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work-Related Road Risks are to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include:

715. Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.

716. Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.

717. Construction vehicle routes to and from the site to be approved with CoL Highways.

718. Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).

719. Construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. The use of cargo bike should be encouraged throughout the construction process.

720. Details on how pedestrian (including most vulnerable) and cyclist safety will be maintained, including any proposed alternative routes (if necessary) and any Banksman arrangements.

721. A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.

722. The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/

Conclusions

723. The proposals are acceptable in transport terms: provided the required alteration, condition and obligation are set out as discussed above

724. Should planning permission be granted the following S106 planning obligations and conditions, along with a s278 agreement which would need to be secured:

725. A condition to secure a Workplace Travel Plan (TP) for the development. The Section 106 agreement shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The Section 106 agreement shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.

726. A condition securing a full Delivery and Servicing Management Plan, which will provide full details on the receiving of deliveries, and the method & management of refuse collection. This condition must be approved prior to first occupation of the site, and the approved plan shall be followed, unless otherwise agreed with the Highway Authority.

727. A condition to restrict the size of the vehicles for delivery and servicing, to longer than 9m in length.

728. A condition requiring the provision of 582 long stay cycle parking spaces and 85 short stay cycle parking spaces within the entire development, designed to London Cycle Design Standards, and the ongoing retention of these facilities.

729. A condition requiring the provision of accessible changing facilities, to ensure full accessibility needs are met.

730. A condition to secure a Construction Logistic Plan (CLP). The Section 106 agreement shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. It should also restrict HGV movement to and from the site to with in the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.

Environmental Impact of Proposals on Surrounding Area

731. Local Plan policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

732. In accordance with the City of London requirements, a Wind tunnel testing has been undertaken to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

733. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, buildings entrances, bus stops, ground and terrace level amenity spaces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

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

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

736. Assessments have been carried out for both the windiest and the summer season.

737. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

738. The wind microclimate across the site was tested for the following configurations:

- Configuration 1: Baseline - The existing Site with the existing surrounding buildings within the 450m radius of the site. The following development, which are currently under construction have been included in the assessment as existing buildings in the baseline:
    - One Leadenhall Court (Planning Reference: 18/00740/FULEIA);
    - 6-8 Bishopsgate (Planning Reference: 17/00447/FULEIA); and
    - 40 Leadenhall (Planning Reference: 13/01004 FULEIA)
    - Following testing, it was identified that 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA) has commenced. Therefore, qualitative analysis of 100 Leadenhall Street in the Baseline scenario is provided.
- Configuration 2: The Proposed Development with the existing surrounding buildings.
- Configuration 3: Future Baseline -The existing Site with the consented cumulative schemes which have commenced construction.
- Configuration 4: Tier 1 - The Proposed Development with the consented cumulative schemes. These include:
    - 1 Undershaft (Planning Reference: 16/00075/FULEIA)
    - 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA);
    - 123 Houndsditch (Planning Reference: 21/00622/FULEIA);
    - Bevis Marks House (Planning Reference: 17/00330/FULMAJ);
    - Fountain House (Planning Reference: 19/00713/FULMAJ);
    - Mark Lane (Planning Reference: 19/01307/FULEIA);
    - 70 Gracechurch (Planning Reference: 20/00816/FULEIA);
    - 153 Fenchurch Street (Planning Reference: 16/00345/FULMAJ);
    - 55 Bishopsgate (Planning Reference: 22/00981/FULEIA); and
    - Friary Court (Planning Reference: 22/00882/FULMAJ)
- Configuration 5: Tier 2 - The Proposed Development with the consented and non-consented cumulative schemes. The non-consented schemes that have been considered include:

- 85 Gracechurch (Planning Reference: 22/01155/FULEIA). Following testing, 85 Gracechurch (Planning Reference: 22/01155/FULEIA) achieved planning consent and is now considered a Tier 1 cumulative scheme. Therefore, its effect of being a Tier 1 cumulative scheme in Configurations 3 and 4 has been assessed qualitatively based on results of Configuration 5.
- Boundary House (Planning Reference: 21/00826/FULMAJ); and
- 15 Minories (Planning Reference: 16/00406/FULMAJ).

739. All configurations were assessed without existing or proposed landscaping to assess the worst-case scenario.

740. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation, and architectural features.

741. The City of London Lawson criteria, set out in the Wind Microclimate Guidelines 2019, defines the safety limit as once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

742. The significance of on-site measurement locations are defined by comparing the wind comfort/safety levels with the intended pedestrian activity at each location, using the following table:

On-site Receptors		
Significance	**Trigger**	**Mitigation required?**
Major Adverse	Conditions are 'unsafe'.	Yes
Moderate Adverse	Conditions are 'unsuitable' (in terms of comfort) for the intended pedestrian use.	Yes
Negligible	Conditions are 'suitable' for the intended pedestrian use.	No
Moderate Beneficial	Conditions are calmer than required for the intended pedestrian use (by at least one comfort category).	No

Figure 13:On-Site Measurement Locations Nature and Scale of Effect

743. The significance of off-site measurement locations are defined not only by comparing the wind comfort levels with the intended pedestrian activity, but also by comparing the conditions to those experienced prior to the introduction of the proposed development (baseline), using the table below:

Off-site Receptors		
Significance	**Trigger**	**Mitigation required?**
Major Adverse	Conditions that were 'safe' in the baseline scenario become 'unsafe' as a result of the Proposed Development. OR Conditions that were 'suitable' in terms of comfort in the baseline scenario become 'unsuitable' as a result of the Proposed Development. OR Conditions that were 'unsafe' in the baseline scenario are made worse as a result of the Proposed Development.	Yes
Moderate Adverse	Conditions that were 'suitable' in terms of comfort in the baseline scenario are made windier (by at least one comfort category) as a result of the Proposed Development, but remain 'suitable' for the intended pedestrian activity.	No
Negligible	Conditions remain the same as in the baseline scenario.	No
Major Beneficial	Conditions that were 'unsafe' in the baseline scenario become 'safe' as a result of the Proposed Development.	No
Moderate Beneficial	Conditions that were 'unsuitable' in terms of comfort in the baseline scenario become 'suitable' as a result of the Proposed Development. OR Conditions that were 'unsafe' in the baseline scenario are made better as a result of the Proposed Development (but not so as to make them 'safe').	No

Figure 14: Off-Site Measurement Locations Nature and Scale of Effect

744. The City of London Lawson Comfort Criteria are as follows:

- Frequent sitting - Acceptable for frequent outdoor sitting use, e.g. restaurants, cafe.
- Occasional sitting - Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies and terraces intended for occasional use etc.
- Standing - Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
- Walking - Acceptable for external pavements, walkways.
- Uncomfortable - Not comfortable for regular pedestrian access.

745. The Wind Tunnel Testing was submitted with the application and was undertaken in July 2023. As noted above, after testing, it was identified that 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA) has commenced.

Therefore, qualitative analysis of 100 Leadenhall Street in the Baseline scenario is provided.

746. In terms of receptors, these have been splits into two categories, as follows:
- On site locations:
  - Pedestrian thoroughfares, including areas that are immediately adjacent to the Proposed Development (i.e. within 5m of the building line). This also includes thoroughfares within the Proposed Development;
  - Entrances, including entrances at ground level; and
  - Amenity areas, including those at ground level and terraces (includes terraces located on the upper levels of the buildings).
- Off site locations:
  - All receptors falling outside the definition of the boundary of the Site, such as thoroughfares, along roads, bus stops, surrounding building entrances, pedestrian crossings and amenity areas, including terraces influenced on upper levels.

747. The following existing receptors have been identified at those in close proximity to the site with terraces:
- One Creechurch Place terrace;
- The Ace Building terrace;
- 11-12 Bury Street; and
- The Aldgate School terrace.

748. The methodology considers that the target condition for seating in residential amenity areas is a wind microclimate that is suitable for frequent sitting or occasional sitting during the summer season. This is because these areas are more likely to be frequently used during the summer when pedestrians would expect to be able to sit comfortably. Occasional sitting or calmer conditions are required at public outdoor seating areas. Frequent sitting conditions are required at spill out seating areas such as permanent café.

749. It is noted that if an area is classified as suitable for occasional sitting in the summer, the windier conditions that occur during the winter season usually mean that the area would be classified as suitable for standing in the windiest season, unless additional shelter was provided. This is considered to be tolerable on the basis that such an area would be most frequently used for sitting during the summer months. At other times of the year, the expectation of usability is lower due to other factors such as temperature and precipitation.

750. Upper-level terraces and large amenity spaces are assessed on the basis that these are intended for good weather use only. Occasional sitting conditions during the summer are considered acceptable for these areas.

Configuration 1: Baseline

751. There are no strong winds threshold in this configuration. The development at 100 Leadenhall would increase windiness along Bury Street to the east. Conditions are generally suitable for frequent sitting around the Site, with mainly occasional sitting or standing to the west and frequent sitting or occasional sitting to the east.

Safety criteria

752. Both the Wind Tunnel testing and CFD assessment concluded that there are no instances of strong winds exceeding the safety threshold at the Site and the nearby surrounding area.

Comfort criteria

Pedestrian Comfort

753. Wind conditions around the existing Site are mostly acceptable for a mixture of frequent sitting and occasional sitting use with some areas having wind conditions acceptable for standing use during the windiest season. This range in conditions would be considered relatively calm. The CFD assessment has identified wind conditions appropriate for walking use only during the windiest season at the Paradise Green building amenity space to the north-west of the Site.

Throughfares

754. On-Site thoroughfare locations have frequent sitting and occasional sitting use wind conditions during the windiest season. These wind conditions are suitable for the intended use.

755. Off-Site thoroughfare locations have wind conditions ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

Entrances

756. On-Site entrance locations have frequent sitting use wind conditions during the windiest season. The CFD assessment results reported similar wind conditions, ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

757. Off-Site entrance locations have wind conditions ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

Bus Stops

758. Tunnel testing has shown that bus stop locations have occasional sitting use wind conditions during the windiest season, whilst CFD has identified a mixture of frequent sitting and occasional sitting use. These wind conditions are suitable for the intended use.

Pedestrian crossings

759. Pedestrian crossings have occasional sitting and standing use wind conditions during the windiest season. These wind conditions are suitable for the intended use.

Ground level amenity areas

760. Mixed use amenity areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use.

761. Wind tunnel testing results reported bench style seating areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use. The CFD assessment results reported wind conditions, ranging from frequent sitting to standing use during the summer season. Standing use wind conditions have been identified:

- to the south of 1 Undershaft,
- to the north and to the west of the Gherkin, and
- in the Paradise Green building amenity space to the north-west of the Site.

762. The above are one category windier than suitable for bench style seating.

763. Café style seating areas have frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use wind conditions that are one category windier conditions than required have been identified:
- at the café style seating areas along Bevis Marks,
- to the east and west of the Gherkin and
- near the Costa kiosk along St Mary Axe (measurement locations 15, 40, 42, 43, 53 and 84).

764. CFD assessment results have also identified standing use wind conditions to the east of the Gherkin, which are two categories windier than suitable for the intended use.

Roof level amenity

765. Off-Site roof level amenity areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use.

Potential effects during demolition and construction

766. It is expected that wind conditions during demolition would be suitable for a working construction site and use as existing of pedestrian thoroughfares, crossings, road users, entrances, bus stops, ground and roof level amenity areas around the Site with the hoarding in place. Therefore, the likely effect is expected to be Negligible (not significant), and no specific wind microclimate mitigation or management procedures are considered necessary during the demolition.

767. As construction of the Proposed Development progresses, wind conditions at the Site would gradually adjust from those of the existing Site to those of the completed Proposed Development. The effects would range from direct, local, short-term (temporary), Moderate Beneficial (Not Significant) to Negligible (Not Significant) at on-Site receptor locations. These wind conditions would be acceptable for construction workers representing a Negligible (Not Significant) effect. Health and safety measures would be implemented also through the CEMP.

768. The wind conditions off-Site would gradually adjust to that with the Completed Development in situ, largely representing a Negligible (Not Significant) effect.

Configuration 2: Proposed Development with Existing Surrounding Buildings

769. Overall the high rise buildings from south through to north-west shelter the Proposed Development from the predominant south-westerly winds; resulting in calm wind conditions at and around the Proposed Development.

Safety Criteria

770. Both Wind tunnel testing and CFD assessment result that there would be no instances of strong winds exceeding the safety threshold at the Site and the nearby surrounding area.

771. As the existing buildings are of the comparable height as the cumulative development, 100 Leadenhall is not expected to draw large amount of winds on the ground level, therefore, it is expected that similar wind conditions as in the Configurations 4 and 5 would prevail along the Bury Street with the inclusion of the 100 Leadenhall in the existing context.

Comfort Criteria

Pedestrian Comfort

772. Wind conditions on Site and in the nearby surrounding area of the Proposed Development would mostly be appropriate for a mixture of frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions. This is because the Proposed Development is sheltered by the existing mid-rise developments to the west and south-west, where the prevailing winds originate.

773. The CFD assessment results reported similar wind conditions with walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

774. All on Site thoroughfares would have frequent sitting and occasional sitting use wind conditions during the windiest season. These wind conditions would represent Moderate Beneficial (Not Significant) effect.

775. All off Site thoroughfares surrounding the Proposed Development would have wind conditions ranging from frequent sitting to standing use during the windiest

season, suitable conditions for the intended use. Wind conditions at the majority of these areas would be consistent with or calmer than in Configuration 1 and would represent a Negligible (Not Significant) effect.

776. Reported occasional sitting use conditions are identified along Bury Street and Creechurch Lane (measurement locations 28, 119 and 159) and standing use wind conditions along St Mary Axe (measurement location 1). These would be one category windier than the baseline scenario (Configuration 1). This would represent a Moderate Adverse (Not Significant) effect. These conditions would remain suitable for the intended use.

Entrances

777. On Site entrances to the Proposed Development would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable conditions for the intended use. These wind conditions would represent Moderate Beneficial (not significant) effects.

778. Off Site entrances surrounding the Proposed Development would have wind conditions ranging from frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 1 and would represent a Negligible (Not Significant) effect.

779. The entrances to the retail outlets to the south along Creechurch Lane (measurement locations 108 and 123), along Bury Street to the north (measurement location 25), along Heneage Lane to north-east (measurement location 134) and the entrance to 18 Bevis Marks (measurement location 142) would be one category windier than the baseline scenario (Configuration 1). This would represent a Moderate Adverse (Not Significant) effect.

Bus stops

780. Bus stops would have occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all of these areas would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

Pedestrian crossing

781. Pedestrian crossings would have occasional sitting use and standing use wind conditions during the windiest season, suitable for the intended use. Wind conditions at these areas would be consistent with Configuration 1 and would represent a Negligible (Not Significant) effect.

Ground level amenity spaces

782. Off Site ground level mixed use amenity areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

783. The on site bench style seating on the ground level would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect.

784. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

785. The CFD assessment reports standing use wind conditions to the south of 1 Undershaft, to the north and to the west of the Gherkin and at bench style seating provisions in the Paradise Green building amenity space to the north-west of the Proposed Development. These are one category windier than suitable for bench style seating, albeit they are consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.

786. Off-Site ground level café style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use wind conditions are reported:

- at the café style seating areas along Bevis Marks, and
- to the east and to the west of the Gherkin (measurement locations 15, 40, 42, 43 and 53)
- south of the proposed development (measurement location 107)

787. The above would be one category windier than suitable. These wind conditions at Bevis Marks and west of the Gherkin would be consistent with the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect.

788. The café style seating provisions near the Costa kiosk along St Mary Axe (measurement location 84) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the baseline scenario (Configuration 1) and would represent Moderate Beneficial (Not Significant) effect. However, the CFD assessment reports occasional seating at this location. Furthermore, the CFD assessment results represent standing use wind conditions at the café style seating area to the east of the Gherkin, which would be two categories windier than suitable for the intended use. However, this would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof level amenity

789. Roof level amenity areas on the Proposed Development would have a mixture of frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent Moderate Beneficial (Not Significant) and Negligible (Not Significant) effects. However, CFD assessment has reported wind conditions ranging from frequent sitting to standing use during the summer season. Standing use wind conditions are identified at roof level amenity area on Level 8 and Level 9. These would be one category windier than suitable for the intended use. This would represent a Moderate Adverse (Significant) effect. Furthermore, the wind tunnel testing reports occasional sitting along the western façade of the level seven terrace of the Proposed Development (measurement locations 214 and 215), which is one category windier than suitable. These conditions would represent a Moderate adverse effect and would require mitigation measures in the form of localised landscaping.

790. The following mitigation measures would be expected to improve conditions:
- A 1.5m tall balustrade, at least 50% solid on all sides of the level seven roof terrace; or
- 1.5m tall planters with planting around the seating provisions; or
- 1.5m tall hedging around the seating provisions.

791. All the off-Site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. The majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

792. There is one roof level amenity space, on the Ace Building to the south of the proposed development which would have occasional sitting use wind conditions during the summer season, one category windier than in the baseline scenario. This would represent a Moderate Adverse (Not Significant) effect.

793. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect.

Configuration 3: Future Baseline

794. Configuration 3 assesses the existing Site with the consented cumulative schemes that have commenced construction and are likely to be built out prior to commencement of construction of the Proposed Development.

795. It is noted that the Future Baseline conditions were not modelled explicitly as part of the CFD assessment. From the CFD results it can be inferred that the impact of the Tier 1 cumulative schemes would result in calmer conditions directly west of the Site on Bury Street, and windier conditions to the southwest of the Site on Leadenhall Street and west of the Site around 1 Undershaft. These changes would not be so extensive as to alter the overall suitability of conditions relative to the Baseline conditions.

796. In terms of the demolition and construction phases, the wind conditions would be suitable for a working construction site and pedestrian thoroughfares, entrances and ground level amenity around the Site. Therefore, the likely effect is expected to be Negligible.

Configuration 4: Proposed Development with Consented Cumulative Surrounding Buildings

797. The development at 85 Gracechurch was assessed as non-consented (Tier 2) cumulative development in Configuration 5, however as it has since achieved planning consent it should now be assessed as a Tier 1 cumulative development. Given that there are other taller buildings in between 85 Gracechurch and application site and that this building is located approximately 390m away from the site, it is considered that any affects would not be significant in the future baseline (Configuration 3) and consented cumulative context (Configuration 4). As such, the discussions for the Configuration 3 and Configuration 4 remain valid.

Safety exceedances

798. In configuration 4, there would be no instances of strong winds exceeding the safety threshold at any measurement location at the Site and the nearby surrounding area.

Comfort Criteria

Pedestrian Comfort

799. In terms of the suitability of the intended uses on site, the wind tunnel testing reports conditions around the Proposed Development that would generally be suitable for frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions.

800. The CFD assessment results that there would be walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

801. With regard to the suitability of thoroughfares, all those at the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

802. Off-site all thoroughfares would be suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 3 and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.

803. Although suitable for their intended use, the following locations would be one category windier than the future baseline (Configuration 3):

- along Bury Street to the north (measurement location 26)
- along Creechurch Lane (measurement locations 126, 128, 129, 130 137 and 159) and
- along Heneage Lane (measurement location 137)

804. These wind conditions would represent a Moderate Adverse (Not Significant) effect.

Entrances

805. Frequent sitting and occasional sitting use wind conditions during the windiest season are reported for all entrances to the Proposed Development. These would be suitable conditions for the intended use and represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

806. All the entrances surrounding the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at all the entrances would be consistent with or calmer than the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, representing calmer wind conditions than in Configuration 2.

Bus Stops

807. All bus stops would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

Pedestrian crossing

808. Occasional sitting use and standing use wind conditions during the windiest season are reported, which are suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that in Configuration 2. The CFD assessment reports standing use or calmer, which represent Negligible to Moderate Adverse effects, both not significant effects.

Ground Level Amenity Spaces

809. Mixed use amenity areas off site would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These would represent a Negligible (Not Significant) effect, consistent with the future baseline scenario (Configuration 3). The CFD assessment reported wind conditions with a mixture of frequent sitting and occasional sitting use. This still represents a Negligible (Not Significant) effect.

810. Both the wind tunnel testing and CFD assessment report frequent sitting use wind conditions during the summer season, on on-site bench style seating provisions on the ground level, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

811. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.

812. CFD assessment reported standing use wind conditions during the summer season to the north and to the west of the Gherkin and Paradise Green building amenity space. These are one category windier than suitable for bench style seating. These wind conditions would be consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.

813. On site café style seating provisions would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2. Furthermore, the off-Site café area represented by probe location 107 would have suitable wind conditions, with windier conditions alleviated due to the shelter from cumulative buildings.

814. Off-site café style seating will range from frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use is reported:
- to the east of the Gherkin (measurement locations 40, 42, 43) and
- near the Costa Kiosk to the west of the Gherkin (measurement location 84)

815. The above reported conditions are one category windier than the suitable conditions. These wind conditions would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

816. The café style seating provisions along Bevis Marks to the north (measurement location 15) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the future baseline scenario (Configuration 3) and would represent a Moderate Beneficial (Not Significant) effect. In the CFD assessment though, the seating area along Bevis Marks reports occasional sitting conditions, similar to the baseline scenario.

817. Standing use wind conditions at the café style seating area to the east of the Gherkin would be up to two categories windier than suitable for the intended use,

however, would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof Level Amenity

818. The roof level amenity space at the proposed development would range from frequent sitting and occasional sitting use wind conditions, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) and Negligible (Not Significant) effect, similar to that observed in Configuration 2).

819. The CFD assessment reports standing use wind conditions on areas of level 8 and 9. These would be one category windier than suitable for the intended use; however, a substantial proportion of the terraces would remain suitable for the intended use. These would represent a Moderate Adverse (Not Significant) effect.

820. Off-site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. Majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect, similar to Configuration 2.

821. One off site roof level amenity area on top of 11-12 Bury Street development (measurement location 205) would have occasional sitting use wind conditions during the summer season. This would be suitable for their intended use, albeit one category windier compared to the future baseline scenario (Configuration 3). These would represent a Moderate Adverse (Not Significant) effect.

822. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that in Configuration 2. Although the CFD assessment result report some occasional sitting use, this is still suitable for the intended use and represents a Moderate Beneficial (Not Significant) effect.

823. Although the occasional sitting use wind condition at the café style seating area at level seven (measurement location 215) is more localised than Configuration 2, mitigation would still be required in the form of a 1.5m balustrade, at least 50% solid on all sides.

Configuration 5: The Proposed Development with Consented and Non-consented Cumulative Surrounding Buildings

824. In configuration 5, the wind conditions reported for each type of use are similar to those reported in configuration 4.

Safety exceedances

825. In configuration 5, there would be no instances of strong winds exceeding the safety threshold at any measurement location at the Site and the nearby surrounding area.

Comfort Criteria

Pedestrian Comfort

826. In terms of the suitability of the intended uses on site, the wind tunnel testing reports conditions around the Proposed Development that would generally be suitable for frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions.

827. The CFD assessment results that there would be walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

828. With regard to the suitability of thoroughfares, all those at the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

829. Off-site all thoroughfares would be suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 3 and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.

830. Although suitable for their intended use, the following locations would be one category windier than the future baseline (Configuration 3):

- along Bury Street to the north (measurement locations 26 and 71)

- along Creechurch Lane (measurement locations 126, 128 and 159) and
- along Heneage Lane (measurement location 137)

831. These wind conditions would represent a Moderate Adverse (Not Significant) effect.

Entrances

832. Frequent sitting and occasional sitting use wind conditions during the windiest season are reported for all entrances to the Proposed Development. These would be suitable conditions for the intended use and represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

833. All the entrances surrounding the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at all the entrances would be consistent with or calmer than the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that in Configuration 2. The CFD assessment reports similar results, representing a Negligible (Not Significant) to Moderate Adverse (Not Significant) effect.

Bus Stops

834. All bus stops would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

Pedestrian crossing

835. Occasional sitting use and standing use wind conditions during the windiest season are reported to all pedestrian crossings, which are suitable for the intended use. Wind conditions at all the areas would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that in Configuration 2. The CFD assessment reports standing use or calmer, which represent Negligible to Moderate Adverse effects, both not significant effects.

Ground Level Amenity Spaces

836. Mixed use amenity areas off site would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These would represent a Negligible (Not Significant) effect, consistent with the future baseline scenario (Configuration 3). The CFD assessment reported wind conditions with a mixture of frequent sitting and occasional sitting use. This still be suitable for their intended use and represents a Negligible (Not Significant) effect.

837. Both the wind tunnel testing and CFD assessment report frequent sitting use wind conditions during the summer season, on on-site bench style seating provisions on the ground level, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

838. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.

839. Whilst suitable for their intended use, bench style seating in the pocket park along the One Creechurch Place (measurement location 186) would have occasional sitting use wind conditions during the summer season, which is one category windier than in the future baseline scenario (Configuration 3), this would represent a Moderate Adverse (Not Significant) effect.

840. CFD assessment reported standing use wind conditions during the summer season to the north and to the west of the Gherkin and Paradise Green building amenity space. These are one category windier than suitable for bench style seating. These wind conditions would be consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.

841. On site café style seating provisions would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.

842. Off-site café style seating will range from frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use is reported:

- to the east of the Gherkin (measurement locations 40, 42, 43) and
- near the Costa Kiosk to the west of the Gherkin (measurement location 84)

843. the above reported conditions are one category windier than the suitable conditions. These wind conditions would be consistent with the future baseline

scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

844. The café style seating provisions along Bevis Marks to the north (measurement location 15) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the future baseline scenario (Configuration 3) and would represent a Moderate Beneficial (Not Significant) effect. In the CFD assessment though, the seating area along Bevis Marks reports occasional sitting conditions, consistent with the baseline scenario.

845. Standing use wind conditions at the café style seating area to the east of the Gherkin would be up to two categories windier than suitable for the intended use, however, would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof Level Amenity

846. The roof level amenity space at the proposed development would range from frequent sitting and occasional sitting use wind conditions, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) and Negligible (Not Significant) effect, similar to that observed in Configuration 2.

847. The CFD assessment reports standing use wind conditions on areas of level 8 and 9. These would be one category windier than suitable for the intended use; however, a substantial proportion of the terraces would remain suitable for the intended use. These would represent a Moderate Adverse (Not Significant) effect.

848. Off site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. Majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect, similar to Configuration 2.

849. One off site roof level amenity area on top of 11-12 Bury Street development (measurement location 205) would have occasional sitting use wind conditions during the summer season. This would be suitable for their intended use, albeit one category windier compared to the future baseline scenario (Configuration 3). These would represent a Moderate Adverse (Not Significant) effect.

850. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that in Configuration 2. Although the CFD assessment result report some occasional siting use, this is still suitable for the intended use and represents a Moderate Beneficial (Not Significant) effect.

Wind Microclimate Conclusion

851. In terms of the safety, there will be no strong winds with a potential to give rise to safety concerns at any of the configurations, including the proposed development within its existing surrounds, consented and non-consented schemes.

852. With the proposed development built, on-site conditions are suitable for the intended uses without landscaping or mitigation measures. This applies to all proposed entrances, seating, benches, seating terraces and mixed amenity terraces. However, café style seating area off-site to the south of the proposed development and café style seating areas on-site on the level seven of the proposed development would have windier than suitable conditions. Landscaping mitigation measures are suggested for level seven of the development. The café seating area to the south of the site is expected to get some protection from existing trees.

853. The wind tunnel testing shows that when the consented cumulative schemes come forward, wind conditions would become one category windier along Creechurch Lane. However, these areas would remain suitable for the intended use. Wind conditions would be suitable for the intended use at the windier than suitable café style seating area to the south of the proposed development. As such, there would be no additional areas that would have windier than required wind conditions, compared to those in the existing context.

854. The CFD assessment results that all off-site conditions are suitable for their intended use, including thoroughfares, crossings, mixed amenity spaces and roof terraces. Seating areas although one or two categories windier, they are consistent with or slightly improved from the baseline conditions. Regarding off-site benches, for those one category windier, conditions are consistent with the baseline conditions. Therefore, impacts are considered negligible.

855. The inclusion of Tier 1 cumulative schemes has a marginal impact on conditions, but does not alter the suitability of conditions for any receptor.

856. The inclusion of Tier 2 cumulative schemes did not have a material impact on conditions.

Daylight, Sunlight, Overshadowing

857. Policy D6(D) of the London Plan states that the design of development should provide sufficient daylight and sunlight to (new) and surrounding housing that is appropriate for its context. whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

858. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

859. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

860. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

861. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

Interpreting results

862. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionally* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-40% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

863. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

864. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered applying the policies set out in policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

865. The application is supported by an Environmental Statement including an assessment (Chapter 10 with associated annexes) of the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage. A Radiance Assessment has also been submitted including visual imagery visually representing the daylight and sunlight results. This analysis has been carried out for Bevis Marks Synagogue, 2 Heneage Lane, 18-20 Creechurch Lane and 2 & 10-16 Creechurch Lane.

866. The Local Planning Authority has commissioned a third party review by BRE, who have reviewed both abovementioned documents.

867. The Radiance Assessment contains Average Daylight factor (ADF) and median daylight factor results for some of the existing buildings. However, the BRE Report states "*Use of the daylight factor or daylight illuminance for loss of light to existing buildings is not generally recommended. This tends to penalise well-daylit existing buildings, because they can take a much bigger and closer obstruction and remain above the minimum recommendations in BS EN 17037. Because BS EN 17037 quotes a number of recommended values for different qualities of daylight provision, such a reduction in light would still constitute a loss of amenity to the room. Conversely if daylight factor and / or daylight illuminance values in an existing building were only just over the recommended minimum, even a tiny reduction in light from a new development would cause them to go below the minimum, restricting what could be built nearby*." The BRE Report goes on to list situations in which use of these methods may be appropriate, such as to a consented, but not yet built, property. According to the BRE review, since the selection of existing buildings assessed in the Radiance Assessment does not include these examples then the use of these methods is not in line with the BRE guidelines. Care should therefore be taken in their interpretation and when giving weight to the outcome of those elements of the assessment.

868. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines. The he local plan (paragraph 3.10.41) states that the CoL will apply the methods set out in the BRE guidelines. That approach is carried forward in the draft City Plan 2040 (paragraph 9.8.1).

869. BRE note that visual imagery are a form of qualitative assessment and it is advised that care should be taken if using and interpreting these images as their appearance will depend on a number of factors including the contrast and brightness of the viewing medium and individual perceptions. In contrast, the BRE guidelines give clear cut measures by which the acceptability of loss of light may be judged. It is noted that officers have considered and interpreted the visual images submitted as part of the radiance assessment qualitatively only. The actual daylight and sunlight impacts have been assessed against the BRE guidelines.

870. Officers consider that the applicants have completed a comprehensive daylight assessment, as set out within Environmental Statement (ES) Chapter 10 and ES Volume 3, Technical Appendix: Daylight, Sunlight and Overshadowing, Solar Glare and Light Spillage. BRE has confirmed that the daylight effects were generally correctly assessed in accordance with BRE Report, 'Site layout planning for daylight and sunlight – A guide to good practice', 2022 (the BRE Guidelines). This is the principal reference document used by local authorities in consideration of daylight and sunlight matters, throughout the UK and including CoL, and is referenced in key planning policy including in Local Plan policy DM 10.7 and in Emerging City Plan policy DE7.

871. The assessment submitted by the applicant considers the existing baseline conditions as the prevailing conditions across the site and of the surrounding area at the time of writing (August 2023), including relevant schemes under construction at the time (with massing due to be predominantly constructed / completed by the commencement of the construction works for the Proposed Development). It is advised that the baseline characterisation was based on site visits and on information and data sources online from the Valuation Office Agency.

872. The evolution of the baseline is an alternative baseline condition at an indeterminate point in the future for a scenario that assumes all relevant neighbouring developments outlined in the 'Cumulative Schemes' for the EIA (refer to ES Volume 1: Chapter 2 EIA Methodology) are built in the surrounding environment, prior to the implementation of the Proposed Development.

873. The Tier 1 cumulative schemes are as follows:

- 2-3 Finsbury Avenue
- Tenter House, 45 Moorfields53
- 1 Undershaft
- 100, 106 & 107 Leadenhall Street
- 115-123 Houndsditch
- Bevis Marks House, 24 Bevis Marks
- Fountain House, 130 Fenchurch Street
- Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane
- 70 Gracechurch Street
- 55 Gracechurch Street
- Seal House, 1 Swan Lane
- 41 Tower Hill
- 1-5 London Wall Buildings
- Finsbury Circus Gardens
- 150-152 & 153 Fenchurch Street

- City Tower and City Place House, 40-55 Basinghall Street
- 55 Bishopsgate
- 85 Gracechurch Street
- 1 Exchange Square
- 65 Crutched Friars
- 1-27 The Arcade Liverpool Street
- 34-40 Whitechurch Lane and 29-31 Commercial Road
- Former Beagle House (Maersk House), Braham Street

874. In terms of the Assessment Methodology in the Environmental Statement, the following scenarios have been assessed in relation to daylight, sunlight and overshadowing:
- Existing Baseline Scenario - This scenario considers the existing daylight, sunlight and overshadowing condition of the Site and surrounding context.
- Future Baseline Scenario - This scenario assumes all Cumulative Schemes have been built out in the absence of the Proposed Development.
- Proposed Development Scenario - This scenario consists of the completed Proposed Development in the context of the surrounding environment; and
- Cumulative Scenario - This scenario considers the effects of the Proposed Development in conjunction with consented Cumulative Schemes in close enough proximity to the site.

875. Of the abovementioned Tier 1 cumulative schemes, the following have been considered with the potential to generate effects to daylight, sunlight, and overshadowing, in conjunction with the Proposed Development, and have been included within the Cumulative Assessment:
- 1 Undershaft (planning reference: 16/00075/FULEIA)
- 100 Leadenhall Street (planning reference: 22/00790/FULEIA)
- 24 Bevis Marks (planning reference: 17/00330/FULMAJ)
- 115-123 Houndsditch (planning reference: 21/00622/FULEIA)

876. For the assessment of the daylight and sunlight the following residential buildings have been considered in the ES:
- 2 Heneage Lane
- 4-8 Creechurch Lane
- 2&10-16 Creechurch Lane
- 18-20 Creechurch Lane
- 27-31 Mitre Street

877. The following places of worship have been considered, as sensitive receptors:
- St Helen’s Church Bishopsgate

- Bevis Marks Synagogue
- St Katherine Cree Church
- St Andrew Undershaft Church

878. The following educational building has been considered, as sensitive receptor:
- Sir John Cass Primary School

879. In terms of overshadowing, the following open spaces, as sensitive receptors, have been assessed:
- 30 St Mary Axe
- Bevis Marks Synagogue Courtyard
- 19 Bevis Marks Rooftop
- 1 Creechurch Place
- Mitre Square Garden
- Three education building amenity areas at Aldgate School
- 11 – 12 Bury Street Rooftop

880. When referring to the degree of effect (negligible, minor, moderate and major) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. Officers agree with these judgements reached in the ES and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the ES in forming a judgement on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (Emerging City Plan Policy DE7).

881. The ES considers moderate and major effects to be significant effects, whilst minor and negligible effects to be not significant effects. In the context of the BRE review all adverse impacts, including minor impacts, have been considered significant. As this is an EIA development and the BRE guidelines do not provide guidance on effect significance in EIA terms, it is considered that professional judgement is reasonable to be applied. The BRE guidance advises that the guidelines should be interpreted flexibly considering the built environment of each area and allows for local authorities to adopt different target values in certain circumstances. Considering that the site is located in a highly dense urban environment, with high-rise buildings in the vicinity, a pragmatic approach, in terms of significance of the effects, is considered reasonable to be applied. Whilst minor

adverse effects may be of local concern, they are not necessarily considered significant in the context of an EIA development in CoL.

882. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premisses, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.

Daylight and Sunlight

883. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met.

884. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times is existing area (20% or more reduction).

885. Both the London Plan 2021 and draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need

to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

886. A total of 10 buildings, including residential, educational and places of worship, have been considered as sensitive receptors and assessed in the baseline condition in relation to daylight and sunlight, as stated above. Within these 10 buildings, a total of 586 windows serving 139 rooms were assessed. 219 windows were assessed for sunlight.

887. The third party reviewer (BRE) concurs that the scope of the study in terms of properties assessed appears reasonable covering the nearest applicable buildings. This includes residential properties, places of worship and a school. It is also noted that other nearby buildings contain offices, to which loss of daylight and sunlight would be less of an issue in the context of the BRE Report. It is therefore appropriate to exclude them from the detailed assessment. Some of the surrounding offices were noticed to be vacant or “to let”. Any loss of daylight and sunlight would only be relevant if they were converted to residential properties in the future.

888. Three scenarios are presented in the ES results in Chapter 10 including:

- Existing baseline vs Proposed
- Existing baseline vs Cumulative (future baseline and proposed) and
- Future baseline vs Cumulative.

889. The BRE reviewer considers that the existing baseline vs cumulative scenario should be seen as the primary assessment of cumulative impact. The future baseline vs proposed scenario is useful in ascertaining the proposed development’s contribution to any cumulative impact. For example, if the results of the future baseline vs proposed analysis contribution to any cumulative impact. For example, if the results of the future baseline vs proposed analysis show little difference in the results, it is other schemes, and not the proposed development, which are responsible for the cumulative impact results.

Existing Baseline

890. In relation to daylight, 20 (3.5%) of the 586 windows assessed for VSC have a baseline equal to or greater than the 27% VSC outlined in the BRE Guidelines. 53 (38.1%) of the 139 rooms assessed for NSL have a baseline daylight distribution of at least 80% or more of the total room area.

891. With regard to sunlight, 49 (22.4%) of the 219 windows meet the BRE criteria for both APSH and WPSH in the baseline condition.

892. The abovementioned assessment indicates that the surrounding receptors currently receive low light levels compared to the initial numerical values of 27% VSC, 80% NSL, 25% APSH and 5% WPSH, outlined in the BRE Guidelines (2022). This is representative of the very dense urban context of the area, which is characterised by a mixture of buildings, including tall buildings. To those windows receiving low levels of daylight and sunlight in the baseline scenario, even very small light losses can translate into large relative or percentage alterations, albeit the perceptible changes may be negligible.

St Andrew Undershaft Church

893. St Andrew Undershaft Church, which is place of worship is located to the southwest of the site

Existing baseline vs Proposed

894. The results suggest that all windows and rooms assessed would meet the BRE loss of daylight guidelines. The proposed development is to the north so would not impact sunlight provision. Therefore, the loss of daylight and sunlight would be assessed as negligible.

Existing baseline vs Cumulative

895. The cumulative scenario suggests that 37 windows would be below the BRE VSC guidelines. The relative losses would be 25-100, compared to the guideline 20% (7 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 16 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 14 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect). However, many of the windows have low values of existing VSC so a small absolute loss results (equating to 0.1% to 5.4% VSC) in a larger relative loss. 35 of the affected windows would serve the main nave and two would serve further auxiliary rooms. The BRE reviewer advises that the ES Chapter assessment of a minor to moderate adverse cumulative impact is reasonable.

Future baseline vs Cumulative

896. In the future baseline vs cumulative scenario the results show no difference in values of VSC or daylight distribution. This suggests that the cumulative impact is driven by other schemes and not the proposed development.

2 Heneage Lane

897. This is a residential receptor to the north of the site.

898. Concerns have been raised regarding the use of this residential property and in particular the light levels on the upper floors. It has been raised that upper floor rooms are utilised throughout the day as rooms for reading (with reading chairs), a key need for a rabbi as study is a religious requirement, and as a playroom for the rabbi's family.

Existing baseline vs Proposed

899. The windows and rooms analysed at 2 Heneage Lane would meet BRE guidelines in terms of daylight. Loss of sunlight would not be an issue since the windows face northerly. Therefore, the loss of daylight and sunlight would be assessed as negligible.

900. In light of the above, the proposed development alone would meet the BRE guidelines in terms of daylight and sunlight and therefore, it would not adversely impact upon the light levels experienced in this residential property, including the upper floor rooms.

Existing baseline vs Cumulative

901. A total of six rooms were assessed. The cumulative scenario suggests that one window would be below the BRE VSC guidelines with a relative loss of 23.3% compared to the guideline 20% which is a Minor Adverse effect. The alteration equates to an absolute change of 2.4% VSC. This is located on the third floor and serves a bedroom with another window that would just meet the guidelines. The ES Chapter states that a weighted average of results gives a 20.8% relative reduction, just below the 20% guideline. The Radiance Assessment gives results of VSC averages for rooms, but the result suggests a slightly different 22.4% reduction. For NSL, all rooms assessed would meet BRE criteria. The ES Chapter suggests a negligible cumulative impact to daylight. However, the BRE review suggests that since one room would be below the VSC guidelines (albeit marginally) a minor adverse cumulative impact would be more appropriate. A Minor Adverse impact is not significant. It is noted that the room would meet the

daylight distribution criteria and therefore, the light levels would be such that even if the room is not only or primarily used for sleeping, other activities including reading and playing would still be able to be carried out.

Future baseline vs Cumulative

902. The future baseline vs cumulative results, show a small difference to one window. This suggests that the primary cause of the cumulative loss comes from other consented schemes than the proposed development.

St Helen's Church Bishopsgate

903. St Helen's Church is located to the northwest of the site, beyond 30 St Mary Axe (the Gherkin).

Existing baseline vs Proposed

904. Although the window map for St Helen's Church was missing from the Annex submitted with the ES, it has thereafter been submitted by the applicant. It should be noted though that a full assessment of St Helen's Church was reported in the assessment of effects in the ES Chapter, and this does not alter outcomes.

905. The windows and rooms analysed at St Helen's Church Bishopsgate would meet BRE loss of daylight guidelines. Loss of sunlight would also meet the BRE guidelines. Loss of daylight and sunlight would therefore be assessed as negligible.

Existing baseline vs Cumulative

906. In the cumulative assessment a total of 49 windows serving 13 rooms were assessed for daylight within this building. Of the 49 windows 23 windows would be below the BRE VSC daylight guidelines. The relative losses would be 33-100% (compared to the guideline 20%), with resultant values in the range 0-7.4% VSC. There are some low existing values which can at least partly explain the larger relative losses. However, there would also be daylight distribution results below the BRE guidelines to eight rooms. The relative losses of the areas able to receive direct skylight would be 24-82% (compared to the guideline 20%).

907. In terms of daylight distribution eight out of 13 rooms would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect

and two would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining four rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect. It is noted that the nave would see a minor adverse NSL loss, retaining 52% NSL.

908. The ES Chapter states that the absolute changes in VSC to the nave may not result in a noticeable change, as shown by the minimal absolute average change to VSC and assesses an overall minor to moderate cumulative adverse impact. The BRE review suggests this would tend to at least moderate for the worst-case rooms based on the daylight distribution results, if they had a particular requirement for daylight. Given the reductions in both VSC and NSL, officers concur with the view taken by the BRE reviewer that the effects would be moderate adverse

909. There would also be windows to St Helen's Church Bishopsgate below the BRE loss of sunlight guidance in the cumulative scenario. Five windows would be below the guidelines with removal of all, or nearly all, of their currently available annual probable sunlight. The ES Chapter assesses a moderate to major impact, which BRE review considers reasonable. However, as noted below the assessment of the future baseline against the cumulative, demonstrates that this is due to other consented schemes.

Future baseline vs Cumulative

910. The results of the future baseline vs cumulative scenario, where one window would be below the VSC guidelines but it has a very low existing value and small absolute loss of 0.1% VSC, suggest that other consented schemes are predominately responsible for the cumulative loss and not the proposed development.

911. In terms of sunlight, ES Chapter presented results suggest the proposed development makes no difference to sunlight at these windows and therefore the cumulative loss is due to other consented schemes, one of which is directly to the south of the church.

Sir John Cass Primary School (Aldgate School)

912. This is an educational receptor located approximately 130m to the east of the application site.

913. It is noted that a few rooms and windows were not included in the initial assessment for daylight and sunlight. However, additional information has been provided during the process of the application.

914. A total of 111 windows serving 21 rooms were assessed for daylight within this building.

Existing baseline vs Proposed

915. The windows and rooms analysed would meet the BRE guidelines in terms of daylight and sunlight. These effects are therefore assessed as negligible.

Existing baseline vs Cumulative

916. The cumulative assessment shows that one room would be below the BRE daylight distribution guideline. The area able to receive direct skylight is reduced by 26.6% compared to the guideline 20%. This room is labelled as a “Play Centre Room” on the second floor. The ES Chapter assessed a negligible cumulative impact to daylight. However, the BRE reviewer considers that since there is an area below the BRE guidelines a minor cumulative loss of daylight would be more appropriate. However, as discussed below, the results suggests that the proposed development does not impact the area able to receive direct skylight in that room and thus, the impact is due to other consented schemes.

Future baseline vs Cumulative

917. The results presented do suggest that the proposed development does not impact the area able to receive direct skylight in the room affected and therefore other consented schemes are the primary reason for the cumulative loss of daylight.

Bevis Marks Synagogue

918. Bevis Marks Synagogue is a place of worship, and it is located to the north of the application site. This building is labelled as 4 Heneage Lane Spanish and Portuguese Synagogue in the results in Annexes 4 and 5 and the window maps in Annex 6.

919. The building comprises the ground floor central space, which has north, west and south facing windows, with a row of windows along the gallery level above.

Due to the open design, the central room is served by both the ground and gallery level windows, albeit the ES Chapter has counted the gallery as a separate room for the NSL assessment. It is understood that prayers are read from the central raised platform (the Bimah). The third room assessed is the Synagogue's visitor centre, situated between Valiant House and the Bevis Marks Synagogue. This room has a glazed 'canopy' roof, a roof light window and four north facing windows by the entrance.

920. The future use of those spaces when in full operations has been clarified by the Rabbi. It has been confirmed that their use will include daily worship, both in the morning and midday, and on the Sabbath and Jewish festivals. Evening events, and weekend weddings would also be conducted. Finally, the visitor centre will be opened Sunday-Friday. It has been forecasted that the visitor centre would be welcoming at least 25,000 visitors a year including local school-children.

921. It is noted that several objections have been received in relation to the impact of the development on the daylight and sunlight within the Synagogue. The effects of the proposed development onto this place of worship are assessed in detail below. As noted above, the applicant aside of the daylight and sunlight assessment has submitted a radiance assessment including visual imagery, providing a contextual narrative, only used as a qualitative assessment to visualise whether there are any noticeable daylight and sunlight differences.

Existing baseline vs Proposed

922. A total of 29 windows serving three rooms were assessed for daylight within this building, of which five are south facing at gallery level. The ES Chapter results suggest that five windows would be below the BRE VSC guidelines. These are the south facing windows which directly face the proposed development. The relative losses would be 27-36% (compared to the guideline 20%), with resultant values in the range 2.3-4.8% VSC. The absolute changes in VSC to these five windows equates to 1.3% to 1.9% VSC. These windows light spaces which are also lit by other windows on other aspects of the building. These are considered minor for four windows and moderate adverse effects for one window, which results in VSC alterations higher than 30%.

923. The ES Chapter and separate radiance assessment discuss the weighted average for the results, indicating a reduction of 0.4% VSC. Since the two main spaces these five windows light (gallery and central room) are large spaces, a loss of light from one area may not be compensated by daylight from a window on the other side of the building and the BRE reviewer considered that a weighted average is not suitable.

924. For NSL, all three rooms assessed (central room, gallery and exhibition/visitor centre) would meet the BRE criteria and so are considered to experience a Negligible effect.

925. The ES Chapters assessed minor adverse impact to daylight is reasonable. In the context of the BRE review report, all impacts, including minor adverse, are considered significant. This is to maintain adequate natural light in existing properties. Although this perspective is aimed to minimise potential negative effects on wellbeing and promoting healthier living environments, it is a precautionary principle. The BRE guidelines do not advise on effect significance in EIA terms and therefore, to assess an EIA development, such as the one currently being assessed, professional judgement should be applied. Effectively, whilst minor adverse effects may be of local concern, they might not be considered significant in the context of the EIA development in CoL. In their review of this position, the BRE reviewer has considered it reasonable. The effect is therefore considered minor adverse.

926. The BRE review also states that the radiance assessment includes Average Daylight Factor and median daylight factor results for the existing baseline, consented baseline and proposed development (with the consented baseline). The results do show a small decrease in the values with the proposed development. However, the BRE guidelines do not recommend the use of these metrics to assess loss of daylight in existing buildings.

927. It is the officers view that given that the VSC and NSL assessments have been carried out in accordance with the BRE suggested methodology for the loss of daylight, the use of an alternative assessment (radiance assessment) to provide a contextual narrative for the daylight in the space is useful for the assessor and the decision makers. Whilst it is understood that the spaces (central room and gallery) are large spaces, they are also served by large windows on all aspects of the building, mainly to the north and south. It is therefore considered that, taking into account the very low absolute VSC values, the daylight distribution results which meet the BRE guidelines, the existing open layout of the Synagogue and existing large windows on all aspects of the building which would largely not be affected (24 out of 29 windows would not be impacted), it is considered that the light levels within the building would not be reduced to an extent that would make impossible to function as a place of worship or as an exhibition centre. It is also not considered that the development, if erected, would diminish the visual appreciation of the internal features of the Synagogue, including the Bimah and Ark.

928. Loss of sunlight to windows would meet the BRE guidelines. Although there would be a loss of sunlight to south facing windows and the rooflight to the exhibition/visitor centre, this would meet the BRE guidelines since the absolute

loss of annual sunlight would be 4% or less. In two cases this is 4%. Given that the loss of sunlight does not relate to losses to living rooms, the effect is not considered to result in adverse impacts on living conditions. The BRE reviewer advises that if there is a particular requirement for sunlight, the loss could be assessed as minor adverse, since the guidelines are only just met. Whilst it is understood form representations received by the Rabbi and the Sephardi community that daylight is necessary to be able to carry out daytime rituals within the Synagogue, direct sunlight is not understood being a requirement for the place of worship to be used for its intended use. Nevertheless, the results indicate that the BRE guidelines for sunlight will be met and therefore, the impact is considered Negligible.

929. Concerns have been raised by a number of objectors regarding the levels of light in the Synagogue. It has been highlighted that these are important to maintain Jewish worship and carry out rituals. Although the matters raised are taken in careful consideration, it is considered that for the reasons explained above, the impacts would be limited and localised. The VSC effects are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA terms. It is noted that the BRE consultant has considered this position reasonable.

Existing baseline vs Cumulative

930. In the cumulative assessment, there would be 17 affected windows. These include the five south facing windows below the guidelines with the proposed development, four north facing windows to the exhibition centre, five west facing windows and three north east facing windows.

931. Out if the 17 affected windows, three are located on the north facing elevation at gallery level and would experience an alteration in VSC of 20.5%, 20.9% and 25.4% compared to the guideline 20%. This is considered a Minor Adverse effect. These windows would see absolute reductions of 0.8% to 1.8% VSC.

932. Of the five windows located on the west facing elevation at ground and gallery level, four would see alterations of 32.4%, 32.6%, 37.5% and 38.2% which are considered Moderate Adverse, and the fifth seeing a 42.6% alteration, which is considered Major Adverse. These alterations equate to absolute changes ranging from 1.1% to 2% VSC.

933. On the south facing elevation, the five facing the application site would experience an alteration in VSC between 40.2% and 52.9% which are considered a Major Adverse effect. However, the absolute reductions at these five windows

would be between 1.8% VSC and 3.1% VSC. These windows light spaces which are also lit by other windows on other aspects of the building.

934. It is noted that the 13 windows servicing the Synagogue's central room and gallery have baseline values of 3.4% to 7.1% VSC, due to the constrained location of the site and relationship with adjacent taller buildings.

935. The final four north facing windows at the entrance of the exhibition centre would see alterations greater than 40% (46% to 72%) which is considered Major Adverse. The absolute reductions equate to 1.4% to 1.8% VSC. The exhibition/visitor centre would continue to receive light through the canopy and rooflight, and so this room would continue to meet the BRE criteria on a room basis.

936. The daylight distribution results for the three areas of the Synagogue (gallery, central room and exhibition/visitor centre) analysed meet the BRE guidelines. It is noted that for the gallery, the area able to receive direct skylight is reduced by 20%, which is the guideline target. The ES Chapter assesses a minor to moderate adverse impact to daylight. The BRE review suggests this would tend to moderate due to the increased number of results below the guidelines. Other schemes are responsible for the loss of daylight to northerly facing areas whilst the proposed development is a factor in the loss of light to the southerly facing windows.

937. Cumulative loss of sunlight results are the same as those reported in the existing vs proposed scenario, meeting the BRE guidelines. The BRE reviewer advises that the same conclusions of an impact to sunlight that could tend to minor adverse, as the southerly facing windows just meet the guidelines, can be drawn.

938. Additional alterations to windows on the north and west elevations of the central room would be due to other consented schemes. The five windows to the south elevation would incur additional alterations as a result of the proposed development and together with consented schemes. However, there are small absolute VSC changes and the BRE criteria are meet on a room basis in terms of daylight distribution. The exhibition centre would see some changes in daylight to the north facing windows as a result of consented schemes; however, would have access to daylight through the canopy and rooflight. The NSL to all three rooms would be BRE compliant. Therefore, due to the additional impact occur from cumulative schemes, the cumulative effect to daylight within this building is considered Minor to Moderate Adverse.

Future baseline vs Cumulative

939. The results of the future baseline vs cumulative scenario show that for VSC, 24 of the 29 (82.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The five remaining windows are located on the south facing elevation at gallery level, thereby serving the main central room. Four of these would experience an alteration in VSC of 34.5%, 32.1%, 31.6% and 32.7%, 37.0% which is considered a Moderate Adverse effect. Although the percentage values are greater than the 'Existing vs Proposed' development, it is noted that the absolute changes remain almost unaltered (between 1 and 1.9% VSC). This is because these five windows and other windows serving the central room at the Future Baseline values, are lower as a result of consented schemes.

940. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

941. In terms of sunlight, Bevis Marks Synagogue would meet the BRE criteria and therefore, the effects would be negligible.

942. On the basis of the above, it is considered that, given that the absolute VSC reductions would be limited and all rooms would meet the BRE criteria for NSL, it is considered that the effects would be Minor Adverse. This is therefore indicative of the minor to moderate effects of the cumulative scenario assessment occur as a result of all cumulative schemes than the proposed development alone.

943. The application is supported by a radiance assessment and Radiance generated images. Although a qualitative assessment, these images show that the impact on the level of daylight will be more localised to a limited area of the mezzanine floor on the south side (an area which is understood to be used by female members of the congregation) than the gallery.

944. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

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

946. Giving due regard to the matters identified in the public sector equality duty with respect to this place of worship and the community associated with it, it is the view of officers, taking into consideration all material factors into consideration, in particular the quantifiable daylight results, the effects would not be such that to cause an adverse effect on the ability to manifest religion in worship in the Bevis Marks Synagogue or prevent the ability to carry out religious activities, including circumcision. Indeed, it is considered that the development would not adversely affect the Synagogue as a place of worship for all who share relevant protected characteristics and those who do not do so and that the duty is complied with in this respect.

4 – 8 Creechurch Street

947. This is a four storey residential building and it is located to the southeast of the application site, approximately 35 metres away. The ES chapter assesses rooms and windows on the north, west and south facing elevations. A total of 59 windows serving 21 rooms are assessed.

Existing baseline vs Proposed

948. Of the 59, 19 windows would be below the BRE VSC guidelines with relative losses between 20.3% and 29.9% compared to the guideline 20%, which are considered minor adverse effects. Resultant values would be in the range 2.6-11.2% VSC.

949. Of these 19 windows, five serve bedrooms. Two of these bedrooms on the fourth storey have a second window and would meet the VSC criteria for the room as a whole. The three other bedrooms, located at first to third storey, would see absolute reductions of 2.4% VSC or less. Therefore, it is unlikely that these alteration would materially affect the function of these rooms. Two of the affected windows serve small galley kitchens on second and third floors. The absolute reductions to those windows equate to 1.3% VSC and 2.3% VSC. Six of the affected windows serve three dual aspect living rooms which each have four windows with absolute VSC reductions ranging from 1% to 3.2%. Due to all three living rooms having two further windows facing away from the Site which are unaffected in terms of daylight, the change is unlikely to be materially harmful and adversely impact the function of these rooms. Two windows which serve a dual aspect living kitchen dining (LKD) room would also be affected, however, the room as a whole would meet BRE's criteria. Finally, four affected windows serve a dual aspect studio apartment on the fourth storey. These two windows would see

minimal absolute alterations of 3% and 3.4% VSC and as a whole it would meet the BRE criteria.

950. Daylight distribution would meet the BRE guidelines.

951. In light of the above, the daylight effects are considered Minor Adverse.

952. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

953. In the cumulative assessment a total of 23 windows would be below the BRE VSC guidelines with relative losses of 20,3% – 53% compared to the 20% guideline. Therefore, four additional windows would be impacted compared to the Proposed Development scenario, with 19 seeing a similar or greater magnitude of VSC impact. nine would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining nine windows would experience an alteration in excess of 40% which is considered a Major Adverse effect. Resultant values would be 2.5-11.1% VSC.

954. Of the 23 windows, nine serve bedrooms. Four of the bedroom windows previously affected would see no change to the magnitude of impact in the cumulative scenario, except for one fourth storey bedroom which would see a Major Adverse cumulative effect. The remaining four bedrooms, which were not affected in the 'Proposed Development' scenario, would result in Minor to Major Adverse effects because of other consented schemes. The effect on the two small galley kitchens would experience the same absolute reduction as the 'Proposed Development' scenario. The same six windows serving three dual aspect living rooms discussed in the Proposed Development scenario would see a greater magnitude of impact in the cumulative scenario. Two of these living rooms would continue to meet BRE's criteria for VSC on a room bases, with the third living room seeing an overall 23% (Minor Adverse) effect. The two windows serving the dual aspect living kitchen dining (LKD) room would also see virtually no change in the magnitude of VSC impact in the cumulative scenario. The four affected windows serve a dual aspect studio apartment on the fourth storey would see additional reductions. These four windows would see alterations of 6.4% to 7% VSC. The room would not meet BRE's criteria for VSC overall, with the additional alterations occurring due to consented schemes.

955. In terms of daylight distribution, all rooms would meet the BRE NSL criteria.

956. The ES Chapter assesses a minor to moderate adverse impact to daylight. This is reasonable, but the BRE review report suggests that the effects would tend to moderate. Given that all rooms would meet the daylight distribution and taking into account the existing dense urban environment at the City, it is the view of officers that the appropriate classification is minor to moderate. Given that the impact on the 'Existing vs Proposed' scenario resulted in Minor Adverse effect, it is considered that the additional effect would be due to other consented schemes.

957. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

958. Of the 59 windows, 20 would be affected, which are located on the north and west facing elevations. 13 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst seven would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

959. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect in that regard.

960. Overall, the VSC and NSL impacts are virtually unchanged from the Existing Vs Proposed assessment and so are considered to remain Minor Adverse.

961. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

962. The results of the future baseline vs cumulative suggest the cumulative loss of light is due to the impact of the proposal with other schemes rather than the development in isolation.

2 and 10-16 Creechurch Street

963. This is a four storey residential building and it is located to the southeast of the application site, 12 metres away at each closest point. Consent for residential use was granted in 2000 for the "*Retention of use as residential Class C3 and temporary sleeping accommodation (as defined in the Greater London Council (General Powers) Act 1973 s.25 (as amended)) and office Class B1(a) in lieu of Class B1(a) office and/or C3 residential at 1st-4th floors of 2 and 10-16 (even) Creechurch Lane and 1st-5th floors of 18-20 (even) Creechurch Lane/24-26 (even) Mitre Street.*" (Ref no: 4118CE). Enforcement complaints were thereafter

lodged for the use of the premises for short term lets. Following assessment and on the limitation imposed by s.44 of the Deregulation Act 2015 and the new s.25A of the Greater London Council (General Powers) Act 1973 (as amended), the enforcement cases closed. Although online searches show that some properties are used as short term lets, the ES Chapter assumes the worst case scenario that they are permanent residential properties.

964. A total of 72 windows on the west facing elevation, serving 16 rooms, have been assessed.

Existing baseline vs Proposed

965. Of the 72 windows, only four meet the BRE VSC guidelines. 68 windows would therefore be below the guidelines with relative losses between 23.9% and 58.5%, compared to the guideline 20%. The ES Chapter states in paragraph 10.143 that "*Due to the close proximity of this neighbour to the Site, the tightly constrained location and being lower compared to the surrounding context, the existing daylight values are generally very low, such that high percentage changes may arise in relation to small absolute reductions*." The BRE review report considers that there is some validity to this point and there are some existing low values of VSC. The values of existing VSC for the 68 windows below the guidelines would be 2.6-9.5% VSC, which would be reduced to 1.5-5.8% VSC.

966. Three of the affected windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect and 69 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

967. There are two living/dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five affected windows (20 affected windows in total). These rooms do not meet the BRE light distribution criteria, resulting in minor to moderate effects (between 21% and 37% reductions).

968. A total of 16 windows affected serve a bank of four bedrooms in the central portion of the elevation. Each of these bedrooms has four windows, which would see absolute reductions of 1.4% to 3.3% VSC. Three of these bedrooms would see NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would see an alteration of 36% (Moderate Adverse). However, it is noted that BRE Guidance suggests that daylight distribution may be considered less important in bedrooms than living areas, as they are mainly used for sleeping.

969. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.9% and 7.3% VSC. One living toom would see a Moderate Adverse NSL alteration, whilst seven would see Major Adverse light distribution alterations.

970. Given the low baseline values, the percentage alterations are very high and disproportionate to absolute reductions. For that reason, the effects are considered moderate to major adverse.

971. The separate 'Radiance Assessment' gives weighted VSC values (an approach recommended in the BRE Report in situations such as the layout here where it is suggested that all rooms analysed are lit by multiple windows). However, no value for the proposed development with the existing baseline appears to have been given, so the results cannot be commented on. Similarly, the submitted visual radiance generated images submitted do not consider the 'Existing vs Proposed' scenario. Further assessment is provided in the sections below.

972. The ES Chapter assesses an overall impact of minor to moderate adverse. The BRE review report suggests this should be at least moderate adverse. Although part of the reason for larger relative losses is due to existing lower values, the vast majority of windows would be below the VSC guidelines and half the rooms, including four living rooms, would be below the daylight distribution guideline. Officers agree with the view taken from the BRE reviewer in terms of the magnitude of overall effects.

973. Loss of sunlight would not be an issue since the development is located to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

974. All 72 windows would be below the VSC guidelines in the cumulative scenario with relative losses in the range 23.9-58.5%, compared to the guideline 20%. Resultant values would be between 1.2% and 2.8% VSC. Three windows would experience a reduction between 30-39.9% which is considered a Moderate Adverse effect and 69 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

975. There are two living dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five affected windows (20 affected windows in total). The absolute reductions equate to VSC levels between 1.4% and 2.9%. The living dining rooms would see NSL alterations of 21% and 37%, which are considered Minor and Moderate Adverse respectively.

Due to the low existing NSL values, which are below 18% NSL in the baseline, the daylight distribution reduction would be very high and potentially not as experienced in these rooms.

976. A total of 16 windows affected serve four bedrooms in the central portion of the elevation. Each of these bedrooms has four windows, which would see absolute VSC reductions of 1.4% to 3.3%. Three of these bedrooms would see NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would see an alteration of 36% (Moderate Adverse). BRE Guidance suggests that daylight distribution may be considered less important in bedrooms, due to their main use for sleeping.

977. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.9% and 7.3% VSC. One living toom would see a Moderate Adverse NSL alteration, whilst seven would see Major Adverse NSL alterations over 40% against the guideline 20%.

978. The separate report contains weighted averages of VSC results for each room. In the cumulative scenario (existing vs cumulative) all 16 rooms would also be below the VSC guidelines with relative losses of 47-78%, compared to the guideline 20%. All 16 rooms would be below the daylight distribution guideline with the areas able to receive direct skylight being reduced by 27.7-57.3%, compared to the guideline 20%.

979. The ES Chapter considers that overall, the VSC and NSL impacts are virtually unchanged from the Existing Vs Proposed assessment and so are considered to remain moderate to major adverse. The BRE review report advises that these should be considered as major impacts. Although there are lower existing values, all windows and rooms assessed at the building would be below the guidelines in general by a large margin. Officers concur with the view taken by the BRE consultant.

980. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

981. Of the 72 windows 71 will be below the BRE guidelines. Three windows would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and eight would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 60 windows would

experience an alteration in excess of 40% which is considered a Major Adverse effect.

982. 23 of the affected windows serve two living dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five or six affected windows. The absolute reductions equate to VSC levels between 1.2% and 2.2%. The living dining rooms would see NSL alterations of 30% and 38%, which are considered Moderate Adverse. The living rooms would see NSL alterations of 27% and 34% which are also Minor and Moderate Adverse effects. Due to the low future baseline NSL values, which are below 18% NSL in the baseline, the alterations are higher than would potentially be experienced in those rooms.

983. 16 of the affected windows serve four bedrooms. Each of these bedrooms has four windows, which would see absolute reductions of 1.4% to 2.5% VSC. Three of these bedrooms would have NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would result in an alteration of 36%. BRE Guidelines suggest that daylight distribution may be considered less important in bedrooms, due to their use primarily for sleeping.

984. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.2% and 3.7% VSC. Five rooms would meet BRE's criteria for NSL and thus will have a Negligible effect, whilst three would see alterations of 22.2%, 26.4% and 32.4% which are Minor and Moderate Adverse effects, respectively.

985. The VSC and NSL impacts are almost unchanged from the Existing Vs Proposed assessment and so are considered to remain minor to moderate adverse.

986. The VSC assessment shows that the level of daylight at these flats is generally very low, which is typical within a highly built up urban environment. The alterations from the Proposed Development (with consented schemes) are in line with reductions already caused from the consented schemes.

987. The separate assessment including Average Daylight Factor and Median Daylight Factor results for the existing baseline, consented baseline and proposed development (with the consented baseline) has been submitted, although this is not recommended in the BRE guidelines. The visual radiance images prepared show that some rooms would not experience noticeable differences, whilst others will experience limitedly noticeable changes. Although it is considered that the proposed development would be a factor in the cumulative loss, it is considered that due to existing dense urban environment, low existing VSC and NSL values

and limited absolute changes, the effects would not be such a to adversely impact the use of these rooms for their intended use.

18 - 20 Creechurch Street

988. This is a four storey residential building, located approximately 12 metres to the southeast of the application site. Consent for residential use was granted in 2000 for the "*Retention of use as residential Class C3 and temporary sleeping accommodation (as defined in the Greater London Council (General Powers) Act 1973 s.25 (as amended)) and office Class B1(a) in lieu of Class B1(a) office and/or C3 residential at 1st-4th floors of 2 and 10-16 (even) Creechurch Lane and 1st-5th floors of 18-20 (even) Creechurch Lane/24-26 (even) Mitre Street.*" (Ref no: 4118CE). Enforcement complaints were thereafter lodged for the use of the premises for short term lets. Following assessment and on the limitation imposed by s.44 of the Deregulation Act 2015 and the new s.25A of the Greater London Council (General Powers) Act 1973 (as amended), the enforcement cases closed. Although online searches show that some properties are used as short term lets, the ES Chapter assumes the worst case scenario that they are permanent residential properties.

989. The building wraps around the corner of Creechurch Lane, meaning that corner windows look directly towards the Proposed Development. Windows on the west and north elevation would have an oblique view of the Proposed Development. Layouts obtained show that a total of 82 windows serving 43 rooms, which are relevant for daylight assessment.

Existing baseline vs Proposed

990. Of the 82 windows assessed, 42 would be below the BRE VSC guidelines. Relative losses of VSC would be 21.4-65.5% compared to the guideline 20%. The values of existing VSC for the 42 windows below the guidelines would be 6.9-20.4% VSC and would be reduced to 4.1-15.4% VSC.

991. Of the 42 affected windows, 13 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 24 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

992. 16 of the affected windows serve nine bedrooms, and five serve single aspect kitchens. These rooms, which see VSC impacts ranging from Minor to Major Adverse, are not considered primary living spaces due their use and so are

considered less sensitive to daylight reductions. The remaining 21 windows serve seven living dining rooms. Four of the living dining rooms are located on the corner of 18-20 Creechurch Lane, which each have four windows facing directly towards the application site. At each living dining room, three of the windows see Moderate to Major Adverse effects, with the stack of windows located on the north facing elevation seeing Minor to Moderate Adverse losses. The absolute alterations to these four living dining rooms on a VSC by room basis range from 6.1-7.7% VSC. It is therefore expected that these reductions would be perceptible. The remaining three living dining areas, each have two windows that are located on north facing elevation. These rooms would experience absolute reductions to VSC on a room basis ranging from 3-3.4% VSC, which is considered unlikely to result in perceptible change.

993. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

994. Considering the type of rooms and their effect, the ES Chapter assessed the overall impact as moderate adverse. This is reasonable overall by the BRE reviewer, but it is suggested that the effects would tend to major for the living area on each of the first to fourth floors where all windows would be below the guidelines, some by a large margin. It is the officers view that taking into consideration of the dense urban nature of the City and the fact that daylight distribution criteria will be met, the overall effects can be considered moderate adverse.

995. Loss of sunlight would not be an issue since the development is located to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

996. In the cumulative scenario, of the 82 windows 62 would be below the BRE VSC guidelines. Relative losses of VSC would be 21.0-86.6%, compared to the guideline 20%. 27 windows would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and nine would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 26 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

997. Of the 43 rooms 34 will experience reductions in daylight distribution. 28 of the affected windows serve 16 bedrooms, where a similar or greater magnitude of impact occurs as a result of cumulative schemes. An additional 12 bedrooms windows would be affected due to cumulative schemes, compared to the

Proposed Development scenario. However, these additional losses equate to less than 2% VSC. Six affected windows serve small kitchens, which is one more than in the Proposed Development scenario. The sixth kitchen would see a 24.2% reduction which is a Minor Adverse effect. However, these bedrooms and kitchens are not considered primary living spaces and so the BRE guidance considers them less sensitive to daylight alterations.

998. The remaining 24 affected windows serve the corner and north living dining rooms. These windows would see a similar or greater magnitude of impact in the cumulative scenario. The fourth floor living dining room on the north elevation is not affected in the Proposed Development scenario and so the impacts occur as a result of cumulative schemes. Finally, three living rooms located further east along the north facing elevation, which were BRE compliant in the Proposed Development scenario, would see reductions from other consented schemes.

999. Of the nine rooms affected for NSL, all would experience an alteration in NSL greater than 40% which is considered a Major Adverse effect. These are all bedrooms and small kitchens where daylight distribution is considered less important due to their use.

1000. The separate report also includes visual Radiance generated images from points in the spaces. Although a qualitative assessment, it provides an indication of whether changes in the daylight will be noticeable. The submitted radiance images suggest that there will be some changes that will be limitedly noticeable.

1001. The ES Chapter suggests a moderate to major cumulative impact. The BRE reviewer considered that these would be major for three rooms on each of first to fourth floor rooms on the west façade to Creechurch Lane and the corner of Creechurch Lane and Mitre Street and two rooms in this area on the fifth floor. Officers considered that overall moderate to major impacts would be reasonable, considering the magnitude of effects and the dense urban environment.

1002. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

1003. Of the 82 windows 46 will be below the BRE guidelines in this scenario. Of the 46 affected windows, 16 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and four would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 26 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1004. A total of 16 windows affected for VSC serve nine bedrooms, and five serve kitchens. These rooms are not considered primary living spaces and therefore are not afforded the same protection in terms of daylight. The remaining 27 windows serve eight living dining spaces, and the final window affected serves one living room. Due to the living dining rooms being located on the corner, with windows fronting the proposed development, are expected to result in large percentage reductions. The living room which is located further east along the north facing elevation would meet the BRE criteria for VSC on a room basis.

1005. In terms of daylight distribution, 34 of the 43 (79.1%) rooms assessed would meet the BRE criteria and are therefore considered to experience a Negligible effect. Of the nine affected rooms, four would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and three would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining two rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1006. Overall, the effects of this scenario are very similar to those of the 'Existing vs Proposed' scenario and are considered moderate adverse. It is considered that the building is a factor for the resultant reductions in daylight.

1007. Although it is considered that the proposed development would be a factor in the cumulative loss, it is considered that due to existing dense urban environment, low existing VSC and NSL values, the effects would not be such as to warrant refusal of the application on those grounds.

1008. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

27 – 31 Mitre Street

1009. This is a four-storey residential building located approximately 35 metres to the east of the application site. A total of 28 windows serving 16 rooms were assessed for daylight within this building.

1010. It is noted that some windows were missing from the windows maps submitted in Annex 6; however, since the submission of the application, further information has been submitted including the additional window maps.

Existing baseline vs Proposed

1011. Of the 28 windows assessed two would be below the BRE VSC guidelines with relative losses of 21.1% and 26.3%, which are considered a Minor Adverse effect. The results suggest that the windows light rooms also lit by other windows which meet the guidelines.

1012. Daylight distribution results show that the BRE guidelines will be met.

1013. Therefore, due to the VSC and NSL compliance, the effect is considered Negligible.

1014. Loss of sunlight would not be an issue since the development is to the northwest. The effect is therefore negligible.

Existing baseline vs Cumulative

1015. In the cumulative scenario, four windows would be below the BRE VSC guidelines with relative losses of 22.1-60.9%, compared to the guideline 20%. One affected window serving a living/kitchen/dining room would experience an alteration in VSC of 22.1%, which is considered Minor Adverse. The three remaining windows serve a bedroom and two LDs, seeing alterations greater than 40%, but the rooms as a whole continue to meet BRE's criteria for VSC.

1016. In terms of daylight distribution, results show that the BRE guidelines will be met. Therefore, the effect would be negligible.

1017. The BRE reviewer considered that the negligible assessed cumulative loss of daylight in the ES Chapter is reasonable. Officers concur within this view.

1018. Loss of sunlight would not be an issue since the development is to the northwest. The effect is therefore negligible.

Future baseline vs Cumulative

1019. Of the 28 windows three will be below the BRE guidelines in this scenario. Of the three affected windows, all would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect. All three rooms would continue to meet BRE's criteria for VSC on a room basis.

1020. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1021. The ES Chapter considered that overall, the effects would be almost the same as the 'Existing vs Proposed' scenario and would remain negligible. Officer concur that due to compliance with VCS and NSL criteria on a room basis, the effects would be negligible.

1022. Again, loss of sunlight is not an issue due to the position of the proposed development in relation to this building.

St Katharine Cree Church

1023. This is religious building, which is located approximately 40m south of the Proposed Development.

1024. A total of 79 windows serving two rooms, which are the nave and an auxiliary room, were assessed for daylight within this building.

Existing baseline vs Proposed

1025. Of the 79 windows analysed to the church, 15 would be below the BRE VSC guidelines with relative reductions of 21.7-42.4% compared to the guideline 20%. The values of existing VSC for the 15 windows below the guidelines would be 3.3-18.6% VSC and, with the proposed development in place, would be reduced to 1.9-13.5% VSC.

1026. All 15 windows serve the main chapel nave, of which 12 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and two would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining window would experience an alteration in excess of 40% which is considered a Major Adverse effect. All windows are located on the north facing elevation and situated in a constrained location due to their position in relation to adjoining buildings. The absolute reductions would be less than 5.1% VSC and the room would continue to meet BRE's criteria for VSC.

1027. In terms of daylight distribution, it is noted that the BRE guidelines are met.

1028. Although the space within the church is large and loss of light to one window, might not be easily mitigated from windows on another elevation, the ES Chapter assessed minor adverse effect to daylight appears reasonable to both the BRE reviewer and officers. Although there are losses of daylight below the BRE guidelines, the space does have other windows which meet the guidelines.

1029. Loss of sunlight would not be an issue since the development is to the north. The effect is therefore negligible.

Existing baseline vs Cumulative

1030. In the cumulative scenario 21 windows would be below the BRE VSC guidelines with relative reductions of 20.2-51.5%, compared to the guideline 20%.

1031. Except for two windows which serve an auxiliary room and see Minor Adverse alterations, the 19 affected windows serve the main nave, of which seven would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 12 would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining two would experience alterations in excess of 40% which is considered a Major Adverse effect.

1032. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1033. The ES Chapter suggests a minor adverse cumulative impact to daylight. This is reasonable if other windows to the spaces would mitigate the loss to those below the BRE guidelines. There is a greater loss of daylight with the other consented schemes, although the proposed development is still a factor in the loss. Officers are in agreement with the ES Chapter assessment of the overall effects and the view taken by the BRE reviewer.

1034. Loss of sunlight would not be an issue since the development is to the north. The effect is therefore negligible

Future baseline vs Cumulative

1035. Of the 79 windows 18 will be below the BRE guidelines in this scenario. Of the 18 affected windows, six would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 11 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining window would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1036. The 16 windows are located on the north facing elevation and situated in a constrained location, as explained above, resulting in high reduction percentages. A further two are located on the west facing elevation. The absolute reductions

would be less than 5.1% VSC, and the room would continue to meet BRE's criteria for VSC.

1037. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1038. Overall, the VSC and NSL impacts are virtually unchanged from the 'Existing Vs Proposed' assessment and so the effect is considered to remain Minor Adverse. Considering that the rooms would meet the VSC criteria for the rooms overall as well as the daylight distribution effects, it is considered that the function on the church would not be adversely affected.

1039. Again, loss of sunlight is not an issue due to the position of the proposed development in relation to this building.

Conclusion on Daylight and Sunlight Impact

1040. In conclusion, it is considered that the ES Chapter 10 has correctly used the methodology assessing daylight and sunlight in accordance with the latest BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.

1041. In summary, the results of the of daylight effects are as follows:

- In the 'Existing vs Proposed' scenario there are only two out of ten properties that would experience a Moderate adverse effect. Three would experience Minor adverse effects and the rest result in Negligible effects. These effects show that the development on each own would have limited effects to the nearby receptors.
- In the 'Existing vs Cumulative' scenario, there is one receptor that would experience Major adverse effects. Moderate to major effects are also expected to another receptor. Moderate effects would experience one more receptor, whilst Minor to Moderate effects are expected to three more receptors. There will be Minor effects experienced by two properties and three will experience Negligible effects.
- In the 'Future baseline vs Proposed (with cumulative)' scenario, there is one receptor that would experience Moderate effects and one Minor to Moderate. The majority of the receptors would receive Negligible effects, with three experiencing Minor adverse effects.

1042. In terms of sunlight, there would only be Negligible effects to both 'Existing vs Proposed' and 'Future baseline vs Proposed (with cumulative)' scenarios. There is only one receptor, St Helen's Church that would experience Moderate to Major Adverse effects, but this appears to be the result of another consented scheme.

1043. In the ‘Existing vs Proposed’ scenario, two of the residential receptors (2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane) would experience a Moderate effect (significant). The rest of the receptors would experience a Miror or Negligible effect (not significant) on daylight. In respect of sunlight, all receptors would experience Negligible effects (not significant) in this scenario. Whilst officers do acknowledge that there are properties that would experience impacts greater than the BRE guidance levels, it is considered that due to the existing low baseline values and the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels. As a result the scheme complies with policy DM10.7 of the Local Plan 2015. The daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the draft City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1044. In the ‘Existing vs Cumulative’ scenario, three of the residential properties considered would experience an effect greater than negligible. Of these three, one (2 and 10-16 Creechurch Lane) would experience a Major Adverse (significant) effect, one (18-20 Creechurch Lane) would experience a Moderate to Major Adverse (significant) effect; and one (4-8 Creechurch Lane) would experience a Minor to Moderate (significant) effect. None of the properties would experience sunlight impacts greater than Negligible. Whilst officers do acknowledge that the properties listed above would experience effects greater than the levels indicated in the BRE Guidance, it is considered that due to the existing low baseline values and the dense urban context, the percentage alterations are higher and therefore, disproportionate compared to the absolute alterations. The absolute alterations in most instances, although perceptible, that would be limited and as such the daylight and sunlight to these properties is not considered to be reduced to an extend that would warrant refusal of the application on those grounds. The proposal together with other consented schemes would not reduce sunlight and daylight to unacceptable levels and the proposal accords with policy DM10.7 of the Local Plan 2015. Sufficient daylight and sunlight would be provided to surrounding housing and other uses, and policy D6(d) of the London Plan 2021 is complied with. The sunlight and daylight would be appropriate for its context and provides acceptable standards, and therefore and policy DE7 of the emerging City Plan 2040 is complied with. The properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1045. In addition, in the cumulative scenario, three religious buildings (Bevis Marks Synagogue, St Helen's Bishopsgate Church and St Andrew's Undershaft Church) would experience an effect greater than negligible. Of these sensitive receptors, one (St Helen's Bishopsgate Church) would experience a Moderate (significant) effect and two (Bevis Marks Synagogue and St Andrew's Undershaft Church) a Minor to Moderate Adverse (significant) effect. Whilst officers do acknowledge that these sensitive receptors would experience impacts greater than the levels indicated in the BRE Guidance and due regard has been given to the matters set out in section 149 of the Equality Act 2010 and the protected characteristics of users of these places of worship, it is considered that due to the existing baseline values, due to the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations are not likely to be noticeable and as such the daylight and sunlight to these sensitive receptors is considered to be appropriate for the context and provide these buildings with acceptable levels of daylight and sunlight in accordance with policy DE7 of the draft City Plan 2040. Further justification for each property is provided in the relevant section of the daylight and sunlight report above.

1046. In the 'Future baseline vs Proposed (with cumulative)' scenario, two of the residential receptors (2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane) would experience a Minor to Moderate and Moderate effect (significant). The rest of the receptors would experience a Minor or Negligible effect (not significant) on daylight. In respect of sunlight, all receptors would experience Negligible effects (not significant) in this scenario. These results are virtually the same as those of the 'Existing vs Proposed' scenario and therefore, the daylight and sunlight levels would not be reduced to unacceptable levels and the scheme accords with policy DM10.7 of the Local Plan 2015. Sufficient daylight and sunlight would be provided to surrounding housing and other uses, and policy D6(d) of the London Plan 2021 is complied with. The sunlight and daylight would be appropriate for its context and provides acceptable standards, and therefore and policy DE7 of the emerging City Plan 2040 is complied with. The properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

Overshadowing

1047. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces

1048. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the

different times of the day and year when shadow would be cast over a surrounding area.

1049. To assess overshadowing the ES has used the following methodologies:
- Transient Overshadowing (TOS); and
- Sun Hours on Ground (SHOG)

1050. BRE Guidelines (2022) suggest that 'sun hours on ground' assessment should be undertaken on the Equinox (21st March and 21st September). It is recommended that at least half of an amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

1051. For the sun on ground and transient overshadowing, the ES Chapter considers all of the private and public amenity spaces to be of high sensitivity.

1052. A total of 9 outdoors spaces have been considered as sensitive receptors, and these are:
- 30 St Mary Axe (public amenity area)
- Bevis Marks Synagogue Courtyard (religious amenity area)
- 19 Bevis Marks Rooftop (office building rooftop amenity area)
- 1 Creechurch Place (office building rooftop amenity area)
- Mitre Square Garden (public amenity area)
- Three education building amenity areas at Aldgate School – playgrounds 1, 2 and 3 (educational building amenity areas)
- 11 – 12 Bury Street Rooftop (office building rooftop amenity area)

1053. Other nearby open spaces identified by the BRE reviewer include the following:
- The area next to the Leadenhall building. This area is predominantly to the south of the proposed development and the overshadowing diagrams suggest that the shadow of the proposed building would only have the potential to reach this area in the early mornings in summer. The proposed development would therefore not impact the results on 21 March
- Abbott's Park, immediately to the west of St Helen's. The shadow of the proposed development does not appear to reach this area as it would be overshadowed by other existing buildings.
- A roof terrace to a building on the northwest (on the northwest corner of the junction of St Mary Axe with Bevis Marks). The overshadowing diagrams suggest that the shadow of the proposed development would pass over this space around mid to late morning on 21 March. However, it does not seem likely to significantly impact the areas able to receive at least two hours of sunlight on 21 March.

- Aldgate Square, to the east of the development. The overshadowing plots suggest that the proposed development would not cause an additional shading to this area on 21 March.

Existing baseline

1054. At the existing baseline, six of the nine surrounding receptors currently meet the BRE 50% area guideline for receiving at least 2 hours of direct sunlight on ground. The remaining three areas, which do not meet the BRE criteria in the baseline condition are:

- 30. St. Mary Axe Public Amenity (4%)
- Bevis Marks Synagogue Courtyard (0%)
- Aldgate School Playground 1 (35%)

Existing Baseline vs Proposed

Transient overshadowing

Equinox (21st March/September)

1055. On these days, shadows are cast from the proposed development from 08:00, which move in a clockwise direction. At this time, the area at 30 St. Mary Axe Plaza would become partially overshadowed by the proposed development. This would clear by approximately 12:00, at which time shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 13:00. Between 11:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. From 13:00 to 14:00, the proposed development shadow passes over the 19 Bevis Mark Rooftop.

1056. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on these days.

Summer Solstice (21st June)

1057. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction. No areas are affected until 09:00, when the area at 30 St. Mary Axe Plaza would become partially overshadowed by the proposed

development. This would clear by approximately 13:00, at which time shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 14:00. Between 13:00 and just before 15:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard. However, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, the proposed development shadow passes over 19 Bevis Mark Rooftop for a very short period. For a very short time at 18:00, then 1 Creechurch Place would see a very small amount of shading from the proposed development alongside shading from existing structures.

1058. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Winter Equinox (21st December)

1059. On this day, shadows are cast from the proposed development from 09:00, which moves in a clockwise direction. At 10:00, the at 30 St. Mary Axe Plaza would see a very small amount of shading from the proposed development in the north eastern corner, which would clear before 11:00. At this time shadow from the proposed development would move over 11-12 Bury Street Rooftop, clearing by 13:00. Between 11:00 and just after 12:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, as noted above, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor.

1060. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Sun Hours on Ground

1061. The nine amenity areas have been quantitively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet BRE's criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st or seeing no alteration greater than 20%.

30 St Mary Axe Plaza

1062. This area receives 2 or more hours of sun on March 21st on just 4% of its total area, due to the built up nature of the surrounding context. This would be reduced to none with the proposed development in place. The northeastern corner of this area where the alteration occurs is likely to only just meet the BRE criteria, due to

the built up nature of the surrounding context and the absolute reduction would likely equate a short period of time where sunlight is reduced. The ES Chapter assessed a minor adverse impact to sunlight. This is reasonable as although there is a large relative loss and any area able to receive at least two hours of sunlight is removed, the existing area is small. The cumulative and future baseline scenarios suggest that although other consented schemes make a small reduction in the results, the impact is predominately due to the proposed development.

19 Bevis Marks Rooftop

1063. This area would see a 7% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 92% of the total area, and would therefore meet the BRE criteria. The effect would therefore be Negligible.

11-12 Bury Street Rooftop

1064. This area would see a 19% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 60% of the total area, and would therefore meet BRE's criteria. As such, the effect is considered Negligible.

11-12 Bury Street Rooftop

1065. This area would see a 19% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 60% of the total area, and would therefore meet BRE's criteria. As such, the effect is considered Negligible.

Bevis Marks Synagogue Courtyard

1066. As it is noted in the 'Relevant history and background' section of this report, as application was at Bury House, 31 Bury Street, was refused by reason of the overbearing and overshadowing impact of the previously proposed development on the setting and amenities of the Grade 1 listed Bevis Marks Synagogue.

1067. It is noted that since the determination of the previous application the courtyard of the Synagogue has undergone changes to include a new ramp to the visitor centre, permanent security booth at the entrance of the site and ticketing booth on the northern part of the courtyard. It is also noted that part of the courtyard will be used in the future for outdoor seating in association with the new café.

1068. Concerns have been raised in the objection letters received regarding the importance of the courtyard to the community's religious and communal activities

and the Synagogue's new exhibition centre and café. The courtyard is used for celebrations and gatherings, such as celebrating a Bar or Bat Mitzvah or celebrations of Succot and weddings.

1069. The courtyard to the Bevis Marks Synagogue would meet the BRE guidelines, although none of its area would be able to receive two hours of sunlight on 21 March currently. There would be 0% reduction, given that the at baseline scenario no area receives two hours of sunlight on 21 March. The submitted Radiance Assessment document includes Sun Exposure analysis and sunlight availability in different months of the year. The BRE reviewer considered that this could be used in conjunction with the shadow diagrams (Annex 7) for an understanding of sunlight provision in the courtyard throughout the year if sunlight at specific times is required, albeit the numerical guidelines in the BRE Report apply to 21 March only.

1070. Although the submitted analysis does not include a scenario of Existing baseline vs Proposed, the results of the proposed development (plus consented schemes) are very similar to those of the consented schemes alone. The changes between the two are almost imperceptible between April and August. For the other half of the year (September till March) the sunlight levels in the courtyard are as low as the baseline scenario. In respect of average sunlight availability, in the baseline scenario, the average sunlight varies from one hour in April to two hours in June. The consented scenario follows a similar pattern, albeit with a 30 min loss on average, reaching a maximum of 1.5 hours in June. In the Proposed Development scenario, which is based on a 'clear sky' assumption, the results show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when compared to the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. Therefore, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would preclude continuing use for religious events and/or as part of the visitor experience visiting the Synagogue's exhibition centre.

Existing Baseline vs Cumulative

Transient overshadowing

Equinox (21st March/September)

1071. On these days, shadows are cast from the proposed development from 08:00, which move in a clockwise direction. At this time, 30 St. Mary Axe Plaza would become partially overshadowed by the Proposed Development. Cumulative

Schemes would begin to overshadow this area at 09:00. The proposed development shadow would clear by approximately 12:00, with Cumulative Schemes overshadowing the area for the remainder of the day. At 12:00, shadow from the proposed development would move over to 11-12 Bury Street Rooftop for a short period, clearing by 13:00. Cumulative Schemes overshadow this area from 15:00 until the end of the day. Between 11:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard. However, similar to the Existing vs Proposed scenario, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. From 14:00 until the end of the day consented schemes shadow would pass over the area, although also would not reach the floor. From 13:00 to 15:00, the proposed development and cumulative schemes shadow would pass over 19 Bevis Mark Rooftop.

1072. The cumulative schemes would not result in any additional shadow to the remaining sensitive amenity areas on these days.

Summer Solstice (21st June)

1073. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction. No areas are affected until 09:00, when the 30 St. Marys Axe Plaza would become partially overshadowed by the proposed development. Cumulative schemes begin to overshadow this area from 11:00. The proposed development shadow would clear by approximately 13:00, and consented schemes would shadow would clear by 16:00. At 13:00, shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 14:00. At this time, the area becomes overshadowed by other cumulative developments until 16:00. Between 13:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, cumulative schemes shadow would pass over the area, although would also be unlikely to reach the floor. At 14:00, the proposed development shadow would pass over 19 Bevis Mark Rooftop for a very short period, before cumulative schemes overshadow the area. For a very short time period at 18:00 the proposed development would shadow 1 Creechurch Place. Aldgate School area 3 would see a very small amount of shading from the other consented schemes alongside shading from existing structures.

1074. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Winter Equinox (21st December)

1075. On this day, shadows are cast from the proposed development from 09:00, which moves in a clockwise direction. At 10:00 30 St. Marys Axe Paza would see a very small amount of shading from the proposed development in the north eastern corner, which would clear by before 11:00. At this time shadow from the proposed development would move over to 11-12 Bury Street Rooftop, clearing by 13:00, with a small amount of additional shading from cumulative schemes at 14:00. Between 11:00 and just after 12:00, the proposed development shadow would pass over the Bevis Marks Synagogue Courtyard. As noted before, the majority of shading is due to other existing buildings, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, cumulative scheme shadows would pass over the area at 13:00, although would also be unlikely to reach the floor.

1076. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Sun Hours on Ground

1077. The nine amenity areas have been quantitively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet the BRE criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st, or seeing no alteration greater than 20%.

1078. There would be no magnitude of impact beyond the BRE criteria in the cumulative scenario for 30 ST Mary Axe Plaza and the Bevis Marks Synagogue courtyard and therefore, the effects would remain the same (Minor Adverse and Negligible, respectively). The 19 Bevis Marks rooftop would see a 10% reduction to the portion seeing at least 2 hours of sun, however, would remain BRE compliant. Therefore, there would overall be no change in the Cumulative Scenario and the effect would remain Negligible. 11-12 Bury Streett Rooftop would see a 41% reduction to the portion seeing at least 2 hours of sun, receiving 74% in the existing baseline condition, which is reduced to 44% due to the Proposed Development and Cumulative Schemes. The areas seeing a reduction are slightly stepped down, resulting in self-shading. The main portion of this area would still see 2 or more hours of sunlight on March 21st, increasing to 6 or more hours in June, when the space is most likely to be enjoyed. Therefore, the ES Chapter considers this effect Minor Adverse. The BRE review considers this is reasonable when considering that 44% of the area would still be able to receive at least two hours of sunlight (compared to the guideline 50%), albeit the large relative loos.

1079. All other sensitive amenity areas would have a Negligible effect.

1080. The impacts based on the Sun Exposure analysis and average sunlight availability submitted with the Radiance Assessment document are addressed in the Existing vs Proposed section above.

Future Baseline vs Cumulative

Transient overshadowing

1081. The results of the transient overshadowing at this scenario are virtually identical to those of the Existing vs Proposed scenario. Therefore, no further assessment is required.

Sun Hours on Ground

1082. The nine amenity areas have been quantitively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet the BRE criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st, or seeing no alteration greater than 20%.

1083. In the Future Baseline condition, 3% of the St Mary Axe Plaza would receive 2 hours of sun on March 21st, which is 1% lower than the Existing Baseline condition, due to consented schemes being built out. In terms of the Bevis Marks Synagogue courtyard, there would be a 0% alteration from the Proposed Development compared to the Future Baseline condition and therefore the effect would remain Negligible. The Future Baseline conditions reduce the portion of the area of the 19 Bevis marks rooftop receiving 2 hours of sun on March 21st to 92%. This area would see a 3% reduction to the portion seeing at least 2 hours of sun, however, would remain BRE compliant. The Future Baseline conditions reduce the portion of the 11-12 Bury Street Rooftop receiving to 67%. This area would see a 34 % reduction to the portion seeing at least 2 hours of sun. The effect would therefore, considered Minor Adverse. All other sensitive amenity areas would have a Negligible effect.

1084. The impacts based on the Sun Exposure analysis and average sunlight availability submitted with the Radiance Assessment document are addressed in the Existing vs Proposed section above.

Overshadowing conclusion

1085. In conclusions, the results show that there would be no materially harmful overshadowing effects caused by the development to any public amenity areas and therefore, the proposal complies with policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

Comparison to the Previously Refused Scheme

1086. As part of the previously refused application (ref number: 20/00848/FULEIA) Daylight, Sunlight and Overshadowing assessment was prepared by Avison Young and thereafter independently reviewed by BRE, who have also reviewed the application that is currently under determination.

1087. For the purposes of comparing the two schemes, it is considered reasonable for the existing and proposed scenarios at the properties in the closer proximity to be assessed to be considered, using the data from the two EIAs. The cumulative scenarios in both assessments are not considered as part of this assessment due to differences in the cumulative scenarios used. Given that the two assessments were undertaken by different consultants a direct comparison of some areas is not possible, due to how they have been performed. However, a third party review from BRE who was both the previous and current reviewer of the daylight and sunlight has been commissioned for the comparison and the following findings are mainly focused on this review.

The Bevis Marks Synagogue

1088. In the assessment for the current proposal, five windows at the Bevis Marks Synagogue would be below the BRE vertical sky component (VSC) guidelines, as discussed in the relevant section above. These are the first floor south west facing windows which light the main space (the central ground floor space and first floor gallery). The space has other windows on other sides of the building, which would not be impacted. The existing values of VSC to the five windows are in the range of 3.6-6.7% VSC. The relative losses to the five windows would be 27-36% with absolute losses of VSC between 1.3-1.9% VSC and resultant values in the range 2.3-4.8% VSC. The impact to daylight would be assessed as minor adverse.

1089. In the previous application the same five windows were also below the BRE guidelines. There are minor differences in the calculated values, which may be expected due to being undertaken by different consultants at different times. The existing values of VSC in this assessment are in the range of 4.1-7.0% VSC. The relative loss of daylight to the five windows was in the range of 25-32% with absolute losses of VSC between 1.3-1.8% VSC and resultant values between 2.8-5.2% VSC. The impact to daylight was assessed as minor adverse.

1090. The differences between the results for the two schemes is therefore very small. The impact to daylight would still be assessed as minor adverse for both schemes.

1091. The results for loss of sunlight to windows with the current scheme suggest that although there would be some loss of sunlight to the south facing windows, the BRE guidelines would be met, albeit with two windows just meeting the guidelines with a loss of annual probable sunlight hours of 4%.

1092. In the previous application, the same windows are affected in terms of loss of sunlight; however, the results of the previous scheme suggest a greater loss of sunlight with three of the five south west windows discussed reduced to below the BRE annual probable sunlight hours guidelines. These three windows below the guidelines would have absolute losses of annual probable sunlight hours in the range of 7-12%. Three further windows to the southeast facing façade would also be below the guidelines. The previous BRE review assessed a moderate adverse impact to sunlight. The worst-case window for loss of sunlight (the most westerly of the five windows on the first floor of the current proposal) is suggested to have a value of 10% with the previously proposed development in place.

1093. In light of the above, it is considered that the loss of sunlight to windows results with the current proposed scheme would represent an improvement compared to the previous scheme.

1094. With regard to overshadowing of the Synagogue's courtyard, the assessment of the previously refused scheme found that 1.5% of the Synagogue courtyard area would receive 2 hours of sun on the equinox in the baseline condition. The updated assessment for the Proposed scheme finds the none of the Synagogue courtyard area would receive 2 hours of sun on the equinox. This is likely a result of the evolving baseline, modelling and software factors noted above.

1095. Overall, it is considered that the result of the daylight and overshadowing effects remain relatively comparable between the previously refused and currently proposed scheme. The sunlight effects of the proposed scheme represent an improvement when compared to the refused scheme.

2 Heneage Lane

1096. The results, when comparing the existing and proposed scenarios, of both the previously refused and currently proposed schemes are assessed to be negligible as the BRE guidelines are met. Loss of sunlight is not an issue for this property due to its orientation.

2 and 10-16 Creechurch Lane

1097. For these properties to the southeast, a comparison of the effects of daylight distribution between the previously refused and currently proposed schemes is not possible because the previously submitted assessment based on assumed layouts, whilst the current one is based on known layouts and the layouts are different.

1098. Of the 72 windows analysed across both assessments, 68 would be below the VSC guidelines with the current proposal. With the previous proposal 67 windows would be below the guidelines. For the current scheme the relative reduction of VSC would be in the range of 24-58%, with absolute losses of VSC in the range of 1.0-3.8%. This compares to a relative reduction of VSC in the range of 21-54% with absolute losses of VSC in the range of 1.0-4.1%. This suggests the two sets of results are similar and there is not a significant difference in impact between the two schemes.

1099. Sunlight is not an issue due to the northernly facing windows.

18 - 20 Creechurch Lane

1100. Similar to the other properties analysed on Creechurch Lane a direct comparison of daylight distribution results is not possible due to different layouts being used between the two assessments.

1101. For the section of the building to Mitre Street, Five windows would be below the BRE guidelines with the previous proposal and six would be below the guidelines with the current proposal. Relative reductions in VSC for windows below the guidelines with the previous proposal would be in the range of 21-28% with absolute losses of 1.9-2.5% VSC. This compares to relative reductions in VSC of 21-28% with the current scheme with absolute losses of 1.5-2.2%. The loss of daylight impact to this section of the building is therefore very similar between the two proposals. Taken those results individually the effects would be considered minor adverse in both schemes.

1102. For the corner section of the building, the relative reduction in VSCs with the previous proposal would be in the range of 20-67%, with absolute losses of 2.9-11.7% VSC. This compared to relative reductions in VSC of 22-66% with the current proposal with absolute losses of 2.8-11.2% VSC. The loss of daylight results between the schemes are therefore very similar. These effects are assessed as major adverse in both schemes.

Conclusion

202 Overall, it is considered that the daylight, sunlight and overshadowing effects of the previously refused scheme and the one currently proposed to the nearby sensitive receptors are very similar, with the exception of the sunlight impacts on the Synagogue, which represent an improvement.

Addressing the daylight/sunlight report submitted on behalf of The S&P Sephardi Community

1103. As part of their response to the latest consultation, the S&P Sephardi Community has submitted a daylight and sunlight empirical report for the Synagogue, using two illuminance meters. The daylight report provides an assessment of the existing daylight levels in Bevis Marks Synagogue and considers how these would be likely to be affected by proposed development. The assessment was carried out between 26th February 2022 to 2nd April 2024 and the illuminance meters were positioned in the central area of the ground floor (Sanctuary), both at a height normal for holding a prayer book at locations BM1 (on the edge of the Bimah) and BM2 (on the pew closest to the Ark). The daylight report advises that light levels were recorded at five minute intervals continuously throughout the monitoring period and that some monitoring data was lost due to practicalities around long-term monitoring in an occupied space, primarily due to human interference related aspects.

1104. This report was review by a third party consultant on behalf of the City and the findings and conclusions are set out below.

1105. The report refers to 767 daily plots; and all of these are stated to have been used for data plotting. These plots could not be found in the material provided and therefore, it was not entirely clear to the reviewer what data was actually included in the analysis.

1106. The independent reviewer states that BS ISO/CIE 19476:2014 'Characterization of the performance of illuminance meters and luminance meters' defines quality indices to characterise the performance of such devices in a general lighting measurement situation, considering two main factors, namely spectral correction and cosine correction. However, it was not possible to source detailed technical data for the type of logging illuminance meter used for monitoring light levels inside the Synagogue. Therefore, the accuracy of the recorded light levels could not be ascertained.

1107. The reviewer of the Bevis Marks daylight also states that "*It is debatable whether the illuminance levels recorded at the two measurement locations are representative for daylight achievable across the entire core area on the ground floor*." The chosen locations can only provide evidence of the daylight levels in those specific locations as opposed to an overall representation of the daylight

across the entire Synagogue. This is evident given the notable differences in the average daily hours that specific illuminances were achieved on a monthly basis, suggesting that location BM1 was visibly better daylit than location BM2. The reviewer considers that this raises the question as to how representative the data recorded for the two measurement locations chosen are for the rest of the space.

1108. With regard to contribution of electric lighting, the daylight report states that this was subtracted from the recorded values only for some dates during the monitoring period (namely 26 February to 7 June 2022) and also that the contribution is small, around 10lux. However, it is not clear whether this is applicable to one or both measurement locations, or indeed to the rest of the space.

1109. In relation to the key illuminance levels chosen to characterise daylight provision for the Bevis Marks Synagogue daylight report (25 lux, 50 lux, 100 lux and 200 lux), the reviewer advises that these are leaning towards the lower values than the key illuminance levels used in British standards, which recommend higher illuminance levels (300 lux horizontally on the book stand and vertically at speaker height in the Bimah, 300 lux vertically over the vertical reader area in the Amud, and 150 lux horizontally at floor level across the Sanctuary). As a result, the data presented in Table 1 of the Bevis Marks Synagogue daylight report indicates that the two locations used for illuminance monitoring generally receive low levels of daylight in the current context.

1110. The Bevis Marks Synagogue daylight report compares the internal illuminance monitoring results against simultaneous external data for the same location. However, the submitted details contain a description of the illuminance data and refers to a complete report for daily plots, which was not provided and therefore, the daily plots of internal versus external illuminance could not be checked.

1111. The results presented in the Bevis Marks Synagogue daylight report suggest that sunlight reflected from neighbouring building façades that penetrates the Synagogue windows contributes significantly to the daylight levels achieved within the core of the ground floor area of the Synagogue throughout the year. A similar argument was also raised in one of the objection letters received during the consultation period, which argued that the proposed development would cast a shadow over the building facades of the nearby buildings, which would impact the daylight levels in the Synagogue.

1112. The analysis of reflected sunlight in section 2.4 of the Bevis Marks Synagogue daylight report is based on shadow plotting and therefore purely geometric. That section concludes that, given the contribution of reflected light to internal daylight levels, computer modelling which adequately accounts for reflected sunlight and skylight can assess more accurately the impacts from the proposed development.

The reviewer considers that this is an appropriate statement based on a sound analysis of reflected sunlight.

1113. Section 3 of the Bevis Marks Synagogue daylight report discusses the results of climate-based daylight modelling, using an approximate as opposed to accurate scenario in terms of the Synagogue and its current surroundings. The daylight report states that the 3D model used for the simulations based on detailed drawings for the Synagogue, but on estimates massing models for the surrounding buildings. The daylight report accepts that the results presented "*should be considered as illustrative until more accurate building geometry is available*."

1114. The Bevis Marks daylight report introduces the total annual illumination (TAI) as the measure to quantify all daylight illumination received at a point indoors for an entire year. The reviewer considers this sensible as it accounts for both direct and reflected light from the sun and the sky which can reach the point indoors. Full details of the results have not been provided and it is also not clear whether the results relate to the locations of the logging illuminance meters used or particular zones of the core area, or the entire core area. Nevertheless, the presented results suggest almost no contribution from direct sunlight and around 99% contribution from sunlight or skylight reflected off the neighbouring buildings. However, the reviewer states that light reflection is fundamentally influenced by reflective surface characteristics including material, texture, and reflectance. No information on surface characteristics could be found in the Bevis Marks Synagogue daylight report and therefore it is not clear what types of material and surface reflectances were used in the calculation model. This is applicable to both external and internal surfaces. Therefore, the proportions of direct and reflected light stated in the report could not be verified.

1115. It is acknowledged that reflected light contributes to internal daylight illumination. However, the results in the daylight report cannot be verified and also reflectivity is highly dependent on the finishing materials of the buildings abutting the Synagogue's courtyard that the development does not relate to. Furthermore, in the context of the BRE guidelines, which is used by local planning authorities to determine planning applications, daylight and sunlight are assessed separately and reflected light is not considered in the metrics used. This is in order to limit the uncertainty related to surface reflectances in an existing context, both outdoors and indoors, and improve the efficiency of the loss of light assessment process.

1116. The Bevis Marks Synagogue daylight report does not give TAI results for the proposed development, albeit the estimated effects show that the light levels would be reduced between 11am and 2pm by the proposed development. Therefore, it does not predict the impacts of the proposed development on daylight levels achievable inside the Synagogue building. The analysis contained therein is only used to support the argument that prediction methods commonly used at

the planning stage to assess impacts on daylight in existing buildings in typical situations are not suitable for the context of the Synagogue because they do not account for contribution from the sun and/or reflected light.

1117. The report concludes that the Synagogue is currently experienced as a *"functionally daylit space for considerable periods of the year"*. This appears to be contradicted by the illuminance monitoring results provided for the two locations chosen inside the Synagogue. In particular, the submitted table suggests that BM1 receives only a few hours daily on the spring and summer months of over 100lux, while BM2 records substantially lower levels. These indicate levels of daylight below the minimum recommended in BS EN17037. Furthermore, the report itself states that current daylight levels are *"at or very close to a 'tipping point'",* which actually deviates from the notion of a *"functionally daylit space"*.

1118. The Applicant's daylight consultants in their response to the submitted Bevis Marks Synagogue daylight report conclude that "While GIA agree that it may be possible to read at 50-100 lux, even if this were the median lux levels exceeded over 50% of the whole ground floor, it would firmly position the Synagogue within the category of dimly daylit space, where additional artificial lighting is likely to be needed during daylight hours, according to the British Standards and BRE Guidance". The Corporation's appointed reviewer agrees with that point.

1119. Whilst the reviewer considers the methodology used in the Bevis Marks Synagogue daylight report is generally reasonable, in their conclusions they note that "*alternative metrics that account for contribution from the sun and reflected light, such as daylight illuminance as defined in BS EN17037 or TAI as proposed in the Bevis Marks daylight report, could be applied when assessing the loss of daylight to the Bevis Marks Synagogue building provided they are part of a climate-based daylight modelling methodology based on a detailed massing model and appropriate calculation parameters. The latter include actual surface reflectances and glazing transmittance as measured in situ for existing indoor and outdoor surfaces and Synagogue windows, alongside suitable calculation points and/or grids, weather data and modelling parameters. Most of these details are missing from the Bevis Marks daylight report.*"

1120. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that the although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and

other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

Solar Glare

1121. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare; distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).

1122. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

1123. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.

1124. The solar glare assessments undertaken assume a worst-case scenario whereby the sun will shine every day during daylight hours which is not the case within the UK.

1125. Solar glare has been assessed via the times of day and year able to receive instances of reflection at example road points and one rail point surrounding the site. All of the road and rail viewpoints assessed are considered to be of high sensitivity.

1126. 41 road locations and one railway location have been identified in the Environmental Statement as sensitive to solar glare. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings, and railway lines at these locations.

1127. From the 41 nearby roads, the proposed development would not be visible from 32 viewpoints. Roads and junctions in the vicinity where points are not considered appear to be based on not having a view of the building, either because it would be blocked by other buildings or one way roads with vehicle traffic facing away from the building. For example, Mitre Street, immediately to the east of the proposed development is a one way street with vehicles moving easterly away from the proposal. However, the third party reviewer has highlighted that for some one way streets in the area, including Mitre Street, cyclists can travel in the opposite direction to the one way street towards the development. It is advised that although solar glare may be an issue to cyclists it could be considered less of an issue than to motorists, as a cyclist may be able to more easily stop, shield their eyes or look away without potential of causing a serious accident. Solar glare could also be an issue if traffic direction is changed in the future.

1128. Since the proposed development is tall there may be the potential of solar glare outside of the area tested. However, the building would be smaller in in size from a distance and the effects would be more limited. The scope of the study focusing on worst-case areas closest to the proposal which is considered appropriate. The viewpoints that face multiple traffic lights have been assessed to include view to each relevant light, which is considered a sensible approach.

1129. There are nine viewpoints that would potentially see solar reflections from the proposed development. Following review of the ES Chapter, some typographical errors in relation to the locations and viewpoints have been corrected.

1130. For three of the nine viewpoints, the instances of reflection would occur on very small areas of glazing, which are broken up by solid elements and occur beyond 20° of a road user's line of vision. Therefore, they will occur for a very short time and the effect would be Negligible (not significant). At five viewpoint locations solar reflections are visible within 10° to 20° or between 10° to 5° of the driver's line of sight for a short period of time. These effects are considered Minor Adverse (not significant). At the remaining location, two viewpoints have been identified, looking left and right at the two traffic lights visible. The potential reflections would be visible within 3° to 5° of a road users' line of sight at various times throughout the year. However, any potential reflections at the lower portion of the proposed development would be shielded by existing buildings. For those reflections which are visible, the majority of reflections would occur above the visor line. Due to the orientation of the two façades where reflections are potentially visible, the period of time and duration of reflections would be limited. Overall, the ES Chapter concludes that the effect to this location would be Minor Adverse (not significant).

1131. The BRE reviewer has suggested further investigation of some viewpoints. However, as highlighted by the applicant, further technical assessments are

typically undertaken when the exact glazing specifications are agreed. These details are not available at this stage of the planning process.

1132. Overall, the potential impact of solar glare from the proposed development is considered at it worse to be minor adverse but the effects are not significant.

1133. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9C(g) of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

1134. Local Plan policy DM15.7 and draft City Plan policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

1135. The potential light spillage impacts arising from the proposed development has been assessed on the following residential and religious buildings:

- Bevis Marks Synagogue
- 2 Heneage Lane
- 10-16 Creechurch Lane
- 6-8 Creechurch Lane

1136. The assessment in the ES states that it is based on a typical internal lighting design and therefore not a final design. The assessment therefore includes the impact of a notional proposed interior lighting on surrounding areas only and does not include any exterior lighting.

1137. The ES Chapter suggests negligible (not significant) effects to Bevis Marks Synagogue, 2 Heneage Lane, 10-16 Creechurch Lane and 6-8 Creechurch Lane and a minor adverse (not significant) effects post-curfew (after 11pm) at 18-20 Creechurch Lane. This is based on coloured plots representing the illuminance on windows at the buildings (no numerical results are given). The results for 18-20 Creechurch would meet the guideline but have values closer to the 5 lux post-curfew target. The BRE reviewer considered the assessment of a minor adverse impact being reasonable based on the information provided.

1138. The suggested mitigation measures would include the submission of detailed lighting scheme to minimise the illuminance levels to the southeast end of the floor plan. This could include the dimming of lights at the perimeter of the floor plan post-curfew and automatic blinds post-curfew. These are sensible for a future detailed internal lighting design. It is considered that similar details for proposed external lighting should also be submitted.

1139. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

1140. Subject to the imposition of the condition for the submission of necessary details, the development would comply with Local Plan policy DM 15.7 and draft City Plan 2040 Policy DE8 and has been designed to avoid light spill.

1141. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the Emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

1142. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared using high resolution Computational Fluid Dynamics (CFD). The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the site, by comparing the predicted felt temperature values and frequency of occurrence.

1143. The assessment was graded against the City of London Thermal Comfort Criteria, as set out in "Thermal Comfort Guidelines for Developments in the City of London". Categories are based upon the seasonal percentage for which thermal conditions are acceptable (UTCI values of between 0° and 32°).

London Thermal Comfort Criteria

KEY	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% 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% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

1144. The thermal comfort conditions have been assessed for entrances, bus stops and amenity spaces.

1145. The purpose of the tests is to compare conditions with and without the proposed development. To assess those conditions the following conditions have been tested:

- Configuration 1: The existing site with existing surrounding buildings (The Baseline);
- Configuration 2: The Proposed Development with existing surrounding buildings;
- Configuration 3: The Proposed Development with the tier 1 cumulative schemes (schemes for which planning permission has been granted, including 6-8 Bishopsgate, Leadenhall Court, 40 Leadenhall Street, Emperor House, Boundary House and 29 - 15 Minories, 57-60 & 62 Aldgate High Street and 1 Little Somerset Street);
- Configuration 4: The Proposed Development with the tier 1 and tier 2 cumulative schemes (schemes which have been submitted and are awaiting determination, including 1 Undershaft, 100, 106 & 107 Leadenhall Street, 115-123 Houndsditch, Bevis Marks House, 24 Bevis Marks, Fountain House, 130 Fenchurch Street, Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane, 70 Gracechurch Street, 150-152 & 153 Fenchurch Street, 55 Bishopsgate, 65 Crutched Friars and 85 Gracechurch Street).

Configuration1: Existing site with the existing surrounding buildings

1146. In the existing baseline configuration, entrances and bus stops are suitable for seasonal or short term use, which satisfies the target condition.

1147. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis marks and Bury Street are suitable for seasonal use. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition. The benches in St Helen's churchyard and west of 30 St Mary Axe are suitable for seasonal use, which satisfies the target condition. The benches to the south of 1 Undershaft are suitable for a mix of seasonal and short term use. The benches to the north of 30 St Mary Axe are suitable for short term use. These are one category above the target condition. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.

1148. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. There are also terraces at the ACE building, 11-12 Bury Street and One Creechurch Place. These terraces are suitable for seasonal use, which satisfies the target condition.

Configuration 2: Proposed development with the existing surrounding buildings

1149. In the proposed development configuration, all entrances to the proposed development would be suitable for a mixture of all-seasonal or seasonal use, which satisfies the target condition. Off-site entrances and bus stops are suitable for all-season to short term use, which satisfies the target condition.

1150. The proposed seating at the south east of the site would be suitable for all-season use. This satisfies the target condition. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis Marks and Bury Street are suitable for seasonal use, which accords with the target condition. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition, same as the baseline conditions.

1151. The proposed benches at the southern end of the site would be suitable for all-season use. This satisfies the target condition. The benches in St Helen's churchyard and west and north of 30 St Mary Axe are suitable for seasonal use,

which satisfies the target condition. The benches to the north of 30 St Mary Axe have improved by one category from the baseline scenario. The benches to the south of 1 Undershaft are suitable for a mix of seasonal and short term use. These are one category above the target condition. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.

1152. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. The terraces at the ACE building, 11-12 Bury Street and One Creechurch Place would be suitable for seasonal use, which satisfies the target condition.

1153. On site, the proposed Level 6 and 7 amenity terraces would be suitable for a mix of all-season and seasonal use. This satisfies the target condition. The proposed Level 8 amenity terrace would be suitable for seasonal use. This satisfies the target condition. The proposed Level 9 amenity terrace is suitable for seasonal use across the majority of the terrace, but has localised regions which are suitable for short-term use at the outer edges of the terrace. Conditions in these locations are driven by the winter conditions, but are still over 90% acceptable throughout spring, summer and autumn. Taking into consideration the extent of the terrace, which is still suitable for seasonal use, it is considered that this terrace will still be suitable for the intended use. At the tower, the proposed Level 22 and roof level amenity terraces would be suitable for a mix of all-season and seasonal use. The proposed Level 36 amenity terrace would be suitable for all-season use. These satisfy the target condition.

Configuration 3: Proposed development with Tier 1 cumulative surrounding buildings

1154. In the proposed development with Tier 1 cumulative buildings configuration, all entrances to the proposed development would be suitable for a mixture of all-seasonal or seasonal use, which satisfies the target condition. Off site entrances and bus stops are suitable for all-season to short term use, which satisfies the target condition.

1155. The proposed seating at the south east of the site would be suitable for all-season use. This satisfies the target condition. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis Marks and Bury Street are suitable for seasonal use, which accords with the target condition. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition, same as the baseline conditions.

1156. The proposed benches at the southern end of the site would be suitable for all-season use. This satisfies the target condition. The existing benches in St Helen's churchyard and west and north of 30 St Mary Axe are suitable for seasonal use, which satisfies the target condition. The benches to the north of 30 St Mary Axe have improved by one category from the baseline scenario. The benches to the south of 1 Undershaft would be suitable for seasonal use, an improvement from Configurations 1 and 2. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.

1157. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. The terraces at the ACE building, 11-12 Bury Street and One Creechurch Place would be suitable for seasonal use, which satisfies the target condition.

1158. On site, the proposed Level 6 and 7 amenity terraces would be suitable for a mix of all-season and seasonal use. This satisfies the target condition. The proposed Level 8 amenity terrace would be suitable for seasonal use. This satisfies the target condition. The proposed Level 9 amenity terrace is suitable for seasonal use across the majority of the terrace but has localised regions which are suitable for short-term use at the outer edges of the terrace. Conditions in these locations are driven by the winter conditions, but are still over 90% acceptable throughout spring, summer and autumn. Taking into consideration the extent of the terrace, which is still suitable for seasonal use, it is considered that this terrace will still be suitable for the intended use. At the tower, the proposed Level 22 and roof level amenity terraces would be suitable for a mix of all-season and seasonal use. The proposed Level 36 amenity terrace would be suitable for all-season use. These satisfy the target condition.

Configuration 4: Proposed development with Tier 1 and Tier 2 cumulative surrounding buildings

1159. In the proposed development with Tier 2 cumulative buildings configuration, the comfort levels recorded would be very similar to Configuration 3. The suitability of conditions is therefore consistent with what was reported for Configuration 3. This applies to on-site entrances, off-site entrances, bus stops, on-site seating, off-site seating, on-site benches, off-site benches, off-site mixed ground level amenity, proposed amenity terraces and off-site amenity terraces.

Thermal Comfort Conclusion

1160. All ground level thermal comfort conditions were either suitable for the intended use, or no worse than the baseline conditions. This applies to all entrances, bus stops, spill-out seating areas, benches and mixed amenity spaces within the study area. The results show that the proposed development would result in a beneficial impact on the existing benches to the north of 30 St Mary Axe, which are made suitable having not been so for the baseline. With regard to off-site terraces, all would be suitable for their intended use. For terraces proposed on site, there will be some localised exceedances at Level 9 terrace, which will be colder than desirable in winter. However, this is not considered to result in an unacceptable level in terms of thermal comfort to an extent to that would make the use of the terrace unsuitable. All other terraces on the proposed development would be suitable for their intended use.

1161. In light of the above, it is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Air Quality

1162. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

1163. The Environmental Statement at Chapter 8 and appendices 8.1 to 8.5 and includes assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development.

1164. An air quality positive statement has been submitted, which details the approach to be undertaken in association with the construction and operation of the proposed development. The air quality positive approach has identified the following:

- The main constraints to air quality at the Application Site are the existing high pollutant concentrations resulting from road traffic emissions, existing high pollutant background concentrations, as well as the proximity of nearby sensitive land uses;

- Design opportunities considered throughout the design stage include proposed energy and ventilation strategies, transport, public and green spaces, and land use;
- Measures will be adopted under the four key areas (better design and reducing exposure, building emissions, transport emissions, innovation and future proofing); and
- An implementation and monitoring plan will ensure that the measures agreed are upheld and adhered to.

1165. The air quality officer has confirmed the air quality positive approach set out in the statement to be acceptable.

1166. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

1167. The proposed development would be car free and heating is through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment and would be Air Quality Positive, and there are mitigations set out within the Air Quality Positive Statement.

1168. Secondary power is proposed to be supplied by a second mains connection, and it has been confirmed there is to be no backup generator installed.

1169. Particulate filtration has been proposed as part of the full mechanical ventilation strategy. Due to the majority of predicted NO2 annual mean concentrations being within 10% of the annual mean objective, and the uncertainty value of the modelling being >10%, NOx filtration will also be required.

1170. The City's Air Quality Officer has no objections following clarifications on the ES Chapter. Conditions are recommended including a restriction on the use of diesel generators, submission of evidence of installation of an appropriate NOx and Particulate filtration system and Non-Road Mobile Machinery Registration.

1171. Subject to conditions, the proposed development would have a minimal impact on local air quality. The scheme meets the air quality neutral and positive benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan Policy 2015 policy policies HL2 and DE1 of the draft City Plan 2040, and Policy SI1 of the London Plan which all seeks to improve air quality.

Noise and Vibration

1172. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.

1173. The Environmental Statement at Chapter 9 and Appendices 9.1 to 9.4 assess the impact from noise and vibration associated with the proposed development, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the proposed development.

1174. The Environmental Statement identifies the following as receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):

- Religious: Bevis Marks Synagogue; St Katherine Cree C of E Church (Both identified as “Medium Risk”).
- Residential: 2 Heneage Lane; 18-20 Creechurch Lane; 10-16 Creechurch Lane; 4-8 Creechurch Lane (all identified as “High Risk”)
- Commercial: 4-10 Heneage Lane; 33 Creechurch Lane; 24 Creechurch Lane; 12-14 Mitre Street; 88 Leadenhall Street; 100 Leadenhall Street; 30 St Mary Axe (The Gherkin); 5-10 Bury Street (all identified as “Low Risk”)

1175. In most City redevelopment schemes the main noise and vibration issues occur during demolition and construction phases. In respect of noise, the assessment identifies that for the two medium sensitivity religious institutions, there would be a negligible impact.

1176. During the majority of the construction period the impact to some high sensitivity residential receptors at 2 Heneage Lane and 4-8 Creechurch are expected to be negligible to minor adverse.

1177. The impact to 10-16 Creechurch Lane however would potentially be significant, being classed as minor adverse to moderate adverse for the majority of the construction phase. The impact to 18-22 Creechurch Lane would also be significant as major adverse effects are expected during demolition and excavation works. Noise mitigation measures and management plans would therefore be required, with specific measures for those expected to be impacted significantly during the works. A Scheme of Protective Works is recommended to be secured by condition.

1178. The statement does not identify any significant effects resulting from construction traffic.

1179. In respect of vibration, the construction works would not result in significant effects to nearby receptors.

1180. Noise and vibration mitigation during the deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Demolition, and a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

1181. Regarding the operational phase of the development, there would not be a significant impact due to road traffic as the number of vehicle attributed to the proposed development would be negligible.

1182. Noise levels from mechanical plant in the completed development would need to comply the City of London's standard requirements that noise output should be 10dB below the background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area. The environmental statement confirms this to be the intention, and it would be a condition of development.

1183. The Proposed Development provides for active uses at lower levels, including retail, food and beverage, and community uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined however, the levels of noise generated from the likely type of commercial activity are expected to be relatively low.

1184. The retail, food and beverage, and community premises could include low levels of background music, in addition to noise from people conversing within the space and using outdoor seating areas.

1185. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces, as well as a restriction on the use of amplified music on these terraces. Operational management plans for each of the commercial elements would be secured by legal agreements, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.

1186. Overall, at worse the cumulative effects would be considered minor adverse, which is not significant throughout the construction and demolition phase, as well as during operation.

1187. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.

1188. The submitted Environmental Statement considers the impact of the development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during the deconstruction/construction and operational phases of the development, the proposed development would comply with polices D13 and D14 of the London Plan and policy DM15.7 of the Local Plan (2015).

Overlooking and overbearing impact to residential properties and other sensitive receptors

1189. Local Plan policy DM21.3 and draft City Plan 2040 policy seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and Draft City Plan 2040 assess residential amenity and not the amenity of office occupiers.

1190. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises.

1191. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.

1192. The proposed amenity terraces for the office accommodation on levels 22, 36 and roof level (level 43), due to their height, separation distance and high balustrade (2.6 metres high) would not result in overlooking and loss of privacy to nearby residential properties to the southeast or the residential unit to the north (2 Heneage Lane).

1193. There are no residential properties to the south or west of the site and therefore, the proposed terraces at Holland House and Renown House would not give rise to overlooking.

1194. The proposed development would result in an increased massing and height. Although the proposed development and in particular the tower element would be

located in close proximity to residential units, it is considered that by nature of the development within the Eastern Cluster, incorporating tall buildings, the proposal would not result in a greater impact to these units greater than that already caused by other consented schemes. It is therefore considered that the development would not be reasonable to be refused on the grounds of resulting in an unacceptable overbearing impact to the nearby residential properties.

1195. A similar development was previously refused due to its adverse effect on the setting of the Grade 1 listed Bevis Marks Synagogue and the setting and amenities of its courtyard by reason of the overbearing and overshadowing impact. Whilst the proposed development would be visible from the Synagogue's courtyard when facing south, it is noted that the massing and height of the development has been reduced since the refusal of the previous application. Furthermore, there is an existing building (Valiant House) intervening between the proposed tower and Bevis Marks Synagogue, which results secures a separation distance between the courtyard and proposed development. It is therefore considered that the proposed development would not detrimentally impact upon the amenities or usability of the courtyard for religious events, by way of being overbearing.

1196. The proposals would not result in any undue overlooking, loss of privacy or overbearing impact. As such, it would comply with Local Plan policy DM21.3 and CS5 and policies HS3 and S23 of the draft City Plan 2040.

Contaminated Land

1197. Local Plan policy DM15.8 and draft City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

1198. Policy S1 of the draft City Plan 2040 expects developers to address land contamination.

1199. The Environmental Statement at Chapter 10 and appendix 10.1 assess the impact of ground conditions associated with the proposed development, including potential effect on construction workers, potential effect on adjacent sensitive users, potential effect on controlled waters and potential effect on groundwater and recharge during operation.

1200. The Environmental Statement concludes that subject to mitigation, no likely significant effects have been identified.

1201. The submission has been reviewed by Environmental Health Officers who have suggested a series of conditions in respect of site investigation and a risk assessment to establish if the site is contaminated and a condition in respect of the process/remediation if contamination is found when carrying out the works. Thames Water have also requested a condition in respect of a piling method statement. Subject to the imposition of conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

Sustainability

Circular Economy

1202. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2, and the emerging City Plan 2040 policy S8 and DE1 set out the City's support for circular economy principles. The application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

1203. The site consists of the following existing buildings: Bury House (31 Bury Street), Holland House (1-4 Bury Street) and Renown House (33-34 Bury Street). The existing Bury House was constructed in the 1967 and is formed of a concrete frame with flat roof and curtain walling with stone-clad sections and large areas of tinted glazing. The main office floors have varying floor to ceiling heights (top of floor slab to underside of floor slab) of 3.29 -3.83m. The structure and core would not be able to facilitate a meaningful adaptation and extension, in particular regarding fire safety, equality and access, energy efficiency, facilities, building services and structural capacity. The current form of the building would also not be easily adaptable for significant public realm improvements and the activation of the ground floor. The basement retaining walls can be retained.

1204. Holland House is a Grade II* listed building constructed in 1916. In addition to the identified required repair and refurbishment works, some local demolition proposed at the rear could connect the building with the other buildings on site via a proposed lift and stair core within Bury House that would serve all three buildings, with minimal interventions into the historic fabric.

1205. Renown House is the smallest of the 3 buildings and was constructed in 1912. The building's constraints are similar to those of Bury House and therefore only the facades are proposed to be retained. All internal floors including the basement

slab would be replaced to allow interconnection between the 3 buildings and improve fire safety, access, energy efficiency and facilities.

Optioneering

1206. An options assessment has been carried out that includes information about how the options would address circular economy principles, set out in this section. Whole life-cycle carbon impacts of the options are set out in the Whole life-cycle carbon emissions section of this report. The optioneering exercise is designed to establish the potential of retention, reuse of materials and the carbon impacts of the options. The options are also evaluated with regard to their opportunities for wider environmental benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2023, chapter 2, paragraph 8.

1207. The optioneering exercise undertaken for this site includes 4 options:

- Option 1: Refurbishment, new cores and new Renown House structure, 92% retained substructure, 88% retained superstructure; 11.207sqm GIA
- Option 2: Refurbishment, new cores, new Renown House structure and extensions, 92% retained substructure, 75% retained superstructure; 13,467sqm GIA
- Option 3: Refurbishment, consolidation with new central core, new Renown House structure and extensions, 92% retained substructure, 77% retained superstructure; 13,467sqm GIA
- Option 4: Redevelopment of Bury House, refurbishment of Holland House, new Renown House structure and extensions, 64% retained substructure, 39% retained superstructure; 40,558sqm GIA

1208. The results of the optioneering with regard to circular economy demonstrate that options 1 – 3 retain very high percentages of the existing buildings' fabric, The three buildings currently serve as office buildings and require a number of essential interventions to ensure their continued use, to include upgrades to energy efficiency, circulation (and equality measures), fabric, end of trip facilities and building services. However, the upgrades in the retained buildings would not result in sufficient improvement of the quality of internal spaces which would limit the commercial viability of the schemes. Options 3 and 4 would offer the opportunity for the new core to share services and provide current access requirements to the heritage advantage of the listed Holland House which can be upgraded with limited physical interventions. Option 4, despite of the redevelopment of Bury House, has been designed to retain the majority of substructure and a substantial amount of existing superstructure.

1209. The explored options are considered to comply with the GLA's Circular Economy Statement guidance requiring a robust exploration of circular economy options for the site. Although the Bury House redevelopment option 4 would result in the highest quantity of demolition waste of the assessed options due to its largest size, it would deliver holistic environmental benefits combining heritage, amenity and wellbeing, urban greening, climate resilience and activation of the local area that are required to future proof the City as a highly sustainable location. This option therefore has been further developed for the application scheme.

1210. The evaluation of the carbon intensity of the options is discussed in the Whole life-cycle carbon emissions section of this report.

The application proposal:

1211. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

1212. A pre-redevelopment audit has been carried out, demonstrating that pre-demolition audit has been carried out to identify opportunities of retention, recovery, reuse and recycling. The proposed scheme includes retention of 64% (by mass) of the site's substructure and 39% of the existing superstructure (Holland House: 64%, Renown and Bury House: 0%). The best reuse opportunities exist for items such as raised access flooring, timber, carpet tiles, metal elements and stone cladding. The demolition material with the highest quantity is concrete which can be recycled through crushing and use as aggregate, for example in the proposed concrete frame of the proposed lower floors.

1213. The strategy includes measures to support reuse and recycling of existing materials within the new built scheme as well as durable materials and construction and sustainable procurement, to include the following principles that will be further developed in the detailed design:

- Evaluation of existing steelwork within the building to be demolished for reuse
- Assessment of opportunities to reuse existing materials, such as the existing retaining walls of the single storey basement to minimise new piling, and the crushed concrete from the existing building utilised in the piling mat and as hardcore
- Use of low carbon materials and products with high recycled contents
- Incorporation of modular products to aid the construction process and the opportunities for disassembly and early re-use

- Design for adaptability and flexibility: opportunity of adaptive reuse of the tower to use as a future hotel, due to the smaller ratio between core and façade lengths
- Design for disassembly of building elements:
    - Glass panels designed to allow ease of replacement and disassembly at end of life
    - Design of building maintenance units to have access to all faces to allow unitised façade disassembly and replacement
    - All plant is accessible and with plant replacement hatches to disassemble all building services at end of life
- Design for longevity:
    - Structure designed for at least a 100-year life span (standard 50- or 60-year lifespan)
    - Incorporation of extreme weather impact assessment including flooding
    - Adherence to relevant industry standard sustainability schemes (e.g. BCSA Sustainability Charter), to ensure robust components
    - Façade design to ensure longest possible life span, to include terracotta cladding.

1214. An update to the Circular Economy Statement resulting from the detailed design stage and a post-completion update in line with the GLA guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

1215. The Energy Statement accompanying the planning application aligns with a variable assessment approach for new build and major refurbishments in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 28.6% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.

1216. The risk of overheating would be reduced through optimising the glazed to solid ratio, in the new build areas achieving 49% glazing, while the refurbished areas would have 32% of glazing. The small footprint of the tower results in relatively shallow floorplates, with the majority of the work desk areas within 10m of the external façade. This provides the opportunity for a mixed mode ventilation strategy. Passive natural ventilation is achieved through vertical ventilation panels to each side of the office windows, reducing the need for mechanical systems by an estimated 50% of the year.

1217. Further energy efficiency measures, such as heat recovery from mechanical ventilation and low energy lighting would be incorporated, achieving a 12.3% carbon reduction over the Part L 2021 baseline overall, an 8.4% carbon reduction for the new build and 27.6% carbon reduction for the refurbishment.

1218. There is currently no available district heating network close enough to the site, and the opportunity to connect into a future district heating network would be incorporated into the basement of the proposed development.

1219. In relation renewable energy technologies, a PV array of 51.3 sqm would be installed on various roof levels and including in conjunction with bio solar roofs. It is recommended that a condition be imposed requiring submission and approval of details. The PVs and air source heat pumps would provide low carbon and renewable energy, reducing the operational carbon emissions overall by over 16% compared to a Building Regulations 2021 compliant building. For the new build, this would be over 15% and for the refurbishment over 20% carbon emission savings.

1220. The air source heat pumps would be located in a central energy centre at roof level of the tower. The mechanical systems for the building have been decentralized with all the air handling plant being located at soffit level of each floor. The facade design includes permeable terracotta spandrel panels to enable drawing or extracting air through the façade. This approach significantly reduces the need for large, centralised plant and makes the floor plates extremely adaptable for fit out and use, reducing over supply, waste and unnecessary carbon emissions.

1221. The submitted energy statement demonstrates that the proposed tower would achieve a 23.7% reduction and the refurbished Holland House and altered Renown House a 48.2% reduction of operational carbon emissions. The site wide and new build carbon reduction does not meet the GLA's 35 % target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. However, the proposed level of operational carbon savings constitutes an improvement on average performances of commercial City developments at planning stage recently assessed. As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

Energy Use Intensity (EUI)

1222. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating

demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m2(GIA)/year and a space heating demand of 15 kWh/m2(GIA)/year. The estimated EUI from the offices of the proposed development is 97.1 kWh/m2/year and for the space heating demand 3.3 kWh/m2/year, the latter being particularly low as the building would be cooling-led due to the internal gains from occupancy, small power, lighting and solar gain.

1223. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building.

1224. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

1225. The proposed development has been pre-assessed under BREEAM New Construction v6 - shell & core (office); shell & core (retail). All uses target an "excellent" rating, 84.15% for the offices, and 77.75% for retail, both with aspiration to achieve "outstanding" ratings through detailed design. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

1226. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

1227. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposals target a 5 star (out of 6 possible) rating.

Whole life-cycle carbon emissions

1228. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The

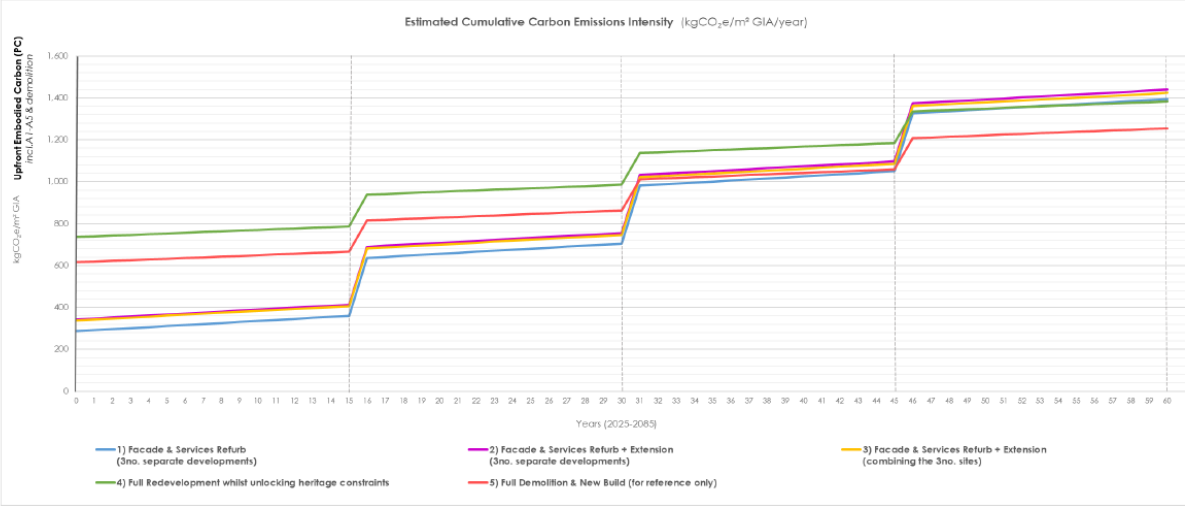
emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon options

1229. 4 options have been assessed with regard to their carbon impacts, environmental and wider planning benefits and constraints:

- Option 1: Refurbishment, new cores and new Renown House structure, 92% retained substructure, 88% retained superstructure; 11.207sqm GIA
- Option 2: Refurbishment, new cores, new Renown House structure and extensions, 92% retained substructure, 75% retained superstructure; 13,467sqm GIA
- Option 3: Refurbishment, consolidation with new central core, new Renown House structure and extensions, 92% retained substructure, 77% retained superstructure; 13,467sqm GIA
- Option 4: Redevelopment of Bury House, refurbishment of Holland House, new Renown House structure and extensions, 64% retained substructure, 39% retained superstructure; 40,558sqm GIA

1230. The following graph and table present the whole life-cycle carbon results from the 4 options.



Graph: Whole life-cycle carbon emissions per square over 60 years

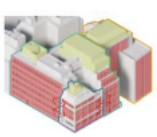
	 Option 1 Facade & Services Refurb (3x separate developments)	 Option 2 Facade & Services Refurb + Extension (3x separate developments)	 Option 3 Facade & Services Refurb + Extension (combining the 3x sites)	 Option 4 Full Redevelopment whilst unlocking heritage constraints
Option Reference	1	2	3	4
Project reference period	60	60	60	60
Gross Internal area (GIA) m²	11,207	13,467	13,467	40,558
Net Internal area (NIA) m²	7,845	9,427	9,427	25,278
Change in NIA (compared to existing) m²	0	1,594	1,594	17,445
Substructure % retained by mass	92%	92%	92%	64%
Superstructure % retained by mass	88%	75%	77%	39%
Total WLCA (incl. B6 & pre-demo) ($kgCO_2e/m^2$ GIA, B7 not included)	1,395	1,440	1,424	1,383
Upfront Embodied Carbon (A1-A5) ($kgCO_2e/m^2$ GIA)	278	332	329	726
In-Use Embodied Carbon (B-C) excl. B6 & B7 ($kgCO_2e/m^2$ GIA)	815	815	815	444
Operational Carbon for building lifetime (B6) ($kgCO_2e/m^2$ GIA)	293	282	271	203
Total WLCA (incl. B6 and pre-demo) (tCO_2e, B7 not included)	15,629	19,387	19,177	56,095
Total existing building demolition (tCO_2e)	88	140	130	402
Upfront Embodied carbon (A1-A5) (tCO_2e)	3,120	4,474	4,426	29,450
In-use embodied carbon (B-C) (tCO_2e)	9,134	10,976	10,976	18,008
Operational Carbon for building life time (B6) (tCO_2e)	3,287	3,798	3,646	8,235

Table: Whole life-cycle carbon results for the options

1231. The options can be analysed in terms of their carbon emissions, opportunities and constraints throughout the GLA's reference period of a 60 year life-cycle as follows:

1232. Option 1 would have the lowest absolute carbon emissions due to the limited new building elements, however this option would have slightly higher whole life-cycle carbon impacts per square meter compared to the Bury House redevelopment option 4, due to operational inefficiencies of the retained buildings. Options 2 and 3 would have slightly higher upfront carbon emissions, total and per square meter compared to option 1, due to proposed extensions and alterations, however the operational carbon emissions of options 2 and 3 would be lower compared to option 1 due to the extensions being able to deliver improved plant spaces. However, option 4 would achieve the greatest efficiencies in the fabric and the MEP strategy with a saving of up to 1/3 of operational carbon compared to the other options.

1233. Due to the almost fourfold floorspace uplift of option 4 compared to the existing buildings and approx. three times of the floorspace compared to options 2 and 3, the absolute carbon emissions of option 4 are more than double compared to the other options. However, the whole life-cycle carbon emissions per square meter of option 4 would be the lowest out of the 4 options. A lower new build option might be able to deliver the same sustainability benefits as option 4 with less embodied carbon impacts, however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London, as set out elsewhere in the report. With regard to sustainability, these benefits include:

- reducing the level of harmful interventions and negative heritage impacts through Bury House hosting up-to-date circulation spaces, end of trip facilities and building services both for Holland House and Renown House
- retaining substantial percentages of the existing structures
- improving social sustainability through the activation and diversification the local area and integration of the site into the context through incorporation of community facilities, retail and public realm improvements
- integrating urban greening and climate resilience measures to intrinsically address local flooding (and the need for SuDS), overheating and urban heat island effects and saving water resources.

1234. Option 4 therefore has been selected as to be developed for the application scheme.

1235. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

1236. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2023 stating in paragraph 157 that the planning system should support the transition to a low carbon future and that it should help to, amongst others, encourage the reuse of existing resources, including the conversion of existing buildings. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

The application proposal:

1237. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions, and the consideration of design options has determined the design to include:

- exploring foundation options to minimise the concrete and steel material quantity
- rationalising the structural grid to be as efficient as possible, minimising the quantity of material within the build structure and ensuring that the material composition of the superstructure is as low carbon as possible – a steel structure with precast concrete floor slabs was selected
- façade embodied carbon assessment resulting in a lower carbon profile ceramic option within a curtain walling system
- replacement of only the thermal components of the retained facades using 50% of reused raised access floor systems.

1238. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development can achieve a result close to the GLA's Standard Benchmark. The measures listed above contribute to achieving upfront carbon emissions that improve on the GLA standard benchmark, and to all embodied carbon emissions reaching close to the GLA standard benchmark, despite the challenges of a tall building structure.

1239. Further opportunities to reduce embodied carbon emissions will be considered during detailed design stages and include:

- maximising the Design for Manufacture and Assembly (DFMA)

- the selection of low carbon aluminium products, such as optimising recycled contents for concrete and steel
- sourcing steelwork from electric arc furnace rather than blast furnace produced steel
- an aluminium framed curtain wall system - aluminium can be easily disassembled, reused and recycled
- maximising reused raised access floor systems.

1240. The table below shows baseline whole life-cycle carbon emissions per square meter for the whole site in relation to the GLA benchmarks for offices at planning application stage (including other uses – the GLA guidance advises to select the most relevant building use in providing data):

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	837	< 950	GLA Standard
		< 600	GLA Aspirational
A–C (excluding B6-B7)	1,447	< 1400	GLA Standard
		< 970	GLA Aspirational
B6+B7	804		
A-C (including B6-B7)	2,251		

1241. The proposed whole site development would result in overall whole life-cycle carbon emissions of 92,937,977 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 33,182,958 kgCO2 (35.7% of the building's whole life-cycle carbon), and the embodied carbon emissions for 59,755,019 kgCO2, (64.3% of the building's whole life-cycle carbon).

1242. A detailed whole life-cycle carbon assessment and a confirmation of the post-construction results are required by conditions.

1243. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable

Development and Climate Change and the emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to a low carbon future in accordance with NPPF (2023) paragraphs 157 and 159.

Urban Greening

1244. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

1245. The proposed development would incorporate 274m² of green roofs, 83m² of standard trees in connected pits with a soil volume at least two-thirds projected canopy of the mature tree, 206m² of flower-rich perennial planting, 424m² of standard trees in pits with a soil volume less than two-thirds projected canopy of the mature tree, 158.5m² of green wall, and a 2.5m water feature.

1246. The projected UGF of the whole site is equal to 0.32, which meets the policy requirement.

1247. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that “Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality.” The emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures including “Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value.”

1248. There are no existing trees on the site to be lost. New trees are proposed in planters at ground floor level in the public realm area, as well as on the upper level terraces of the development. All new greening at the site represents a net-gain.

1249. It is recommended that further details of urban greening measures, and the landscaping and planting strategies are to be secured by condition. Subject to compliance with these conditions the proposal would be policy compliant with regards to Urban Greening.

Climate Resilience

1250. NPPF Paragraph 159 requires new development to avoid increased vulnerability to the range of impacts arising from climate change. Policy DM15.5 Climate change resilience and adaptation of the Local Plan 2015 and Policy DE1 of the draft Local Plan 20240 require climate change adaptation measures to be incorporated into development and for developers to demonstrate how they will improve environmental performance and mitigate and adapt to climate change.

1251. Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Climate Change Resilience Sustainability Statement (CCRSS) (Hoare Lea, August 2024)
- Sustainability Statement (Hoare Lea, October 23)
- Design and Access Statement (Stiff+Trevillion, January 2024)
- Flood Risk Assessment and Drainage Strategy (Thorton Tomasetti, January 2024)
- Outdoor Thermal Comfort Assessment (GIA Chartered Surveyors, October 2023)
- Preliminary Ecological Appraisal and Biodiversity Net Gain Report (Hilson Moran, September 2023)
- Health Impact Assessment (Quod, January 2024)

Overheating and the urban heat island effect

1252. An outdoor thermal comfort assessment was conducted by GIA using high resolution Computational Fluid Dynamics (CFD). The assessment found:

- All ground level conditions were suitable for intended use, or no worse than the baseline conditions
- The proposed development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe
- Conditions for all existing off-site terraces are suitable for the intended use
- Conditions for all proposed terraces are suitable for the intended use.

1253. Section 8.3 within the CCRSS (Climate Change Resilience Sustainability Statement) (Rev.4 - Hoare Lee, August 2024) covers the risk of heat stress and assesses the following hazards:

- Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk)
- Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk)
- Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk)
- High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk)
- Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk)
- Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk)

1254. Increased risk of damage to building materials (Moderate Risk)

1255. To manage the above risks, the CCRSS states that the following design features and techniques will be included:

- Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources
- Facade and building services have been designed with a fan coil cooling solution
- Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling –
- An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:
    - All ground level conditions were suitable for intended use, or no worse than the baseline conditions.
    - The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary’s Axe.
    - Conditions for all existing off-site terraces are suitable for the intended use.
    - Conditions for all proposed terraces are suitable for the intended use

- Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present
- Building maintenance strategy will be implemented to check and treat materials for UV damage
- Materials on exposed areas will be designed and installed to weather effectively
- Structural foundations and frame have been designed to accommodate a range of soil stiffness values
- All heat stress hazards residual risks have been assessed as Low.

1256. The Climate Change resilience officer has confirmed the proposal to be policy compliant with regards to overheating and the urban heat island effect, and the proposal is therefore considered to be acceptable in this regard.

Flooding

1257. The application site is located within Flood Zone 1 and is therefore identified as being an area at low risk of fluvial and tidal flooding.

1258. Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards:
- Rising sea levels could increase the risk of flooding to the building and the surrounding area (High risk)
- Increased duration of prolonged rainfall could cause an increased risk of surface water flooding (Very High risk)
- Increased risk of flooding causing significant damage to the development and requirements for weather proofing (Moderate risk)

1259. The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low

1260. The Climate Change resilience officer has confirmed the proposed development is policy compliant with regard to flooding and the proposal is therefore considered to be acceptable in this regard.

Water stress

1261. Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards:

- Increased risk of drought (Moderate risk)
- Increased duration of prolonged rainfall could cause impacts on structural stability within the building (Moderate risk)
- Risk of material degradation due to extended exposure of building materials to increased moisture levels (Moderate/ low risk)
- Increased risk of extended duration of water stress and high water costs (Moderate risk)

1262. In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks:

- Project will prioritise native, locally sourced plants for the public realm landscape strategy
- Landscape strategy supported by ecologists and landscape architect's recommendations such as appropriate species which are resilient to periods of water scarcity
- Roof drainage will be used for irrigation of green walls and roofing
- SuDS in the form of blue roofs and tanks will attenuate rainfall
- Site is not at risk from groundwater flooding
- Lowest level basement slab will be designed for Grade 3 waterproofing which will protect against future risk
- Internal linings proposed in retained basements
- Efficient water fittings installed to reduce water consumption

1263. All water stress hazards' residual risks have been assessed as Low. The FRA & DS states that "roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants."

1264. The climate change resilience officer has confirmed the proposal is policy compliant with regard to water stress and the proposal is therefore considered to be acceptable.

Biodiversity Net Gain, pests and diseases

1265. Section 8.4 of the CCRSS assesses the risk to natural capital and includes risk of loss of biodiversity and high quality green space (Moderate Risk). This risk will be managed through:

- Introducing increased vegetation on site, in green roofing, terrace planting and public realm planting
- Habitat infrastructure such as bird and insect boxes to be installed
- Project will prioritise native, locally sourced plants for the landscape strategy

1266. The CCRSS classes the residual risk as Low.

1267. Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards:
- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to humans (Moderate Risk)
- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to plants (Moderate Risk)

1268. The CCRSS states this risk will be managed through:
- Implementation of a pest management plan or implementation of an accredited Pest Management program
- Regular monitoring and maintenance of ventilation systems
- Consideration of new warm-climate pests will be factored into final species selection for planting

1269. The CCRSS assesses the residual risk to be Moderate /Low.

1270. A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

1271. The proposed development will achieve 300% net gain, in the form of “area based habitat” establishes a total ecological value of the final development site of 0.30 habitat units. This is comprised of 0.1 units Intensive Green Roof, 0.14 Urban trees, 0.02 Green Wall, 0.04 Ground level planters, 0.02 sustainable drainage system.

1272. The proposals would achieve a UGF of 0.32 and this is through greening at ground level and the upper level terraces. The ground level public realm planting would be within standard tree pits and planters, as well as the vertical climbing green wall. Further green roofs trees and planters are proposed on each of the

terraces at 7th, 8th, 9th, 22nd, 23rd, 36th and 37th levels, as well as at the inaccessible RF1 and RF3 levels.

1273. A range of acceptable native species are proposed and with the correct management could provide high level biodiversity value. Further details of the proposed landscaping with regard to species and management is recommended to be secured by condition. The final details of the UGF are also recommended to be secured by condition.

1274. A series of conditions are recommended to secure the implementation and management of the proposed biodiversity net gain measures.

1275. A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health overall. This assessed in more detail in the 'Health Impact assessment' section below, and is considered to be acceptable.

Food, Trade, Infrastructure

1276. The proposed development would make a positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change.

1277. The proposed development would include facilities that are directly beneficial to the local economy in the form of trade, such as the retail, cultural/community spaces. The proposed facilities would enable occupiers to use active transport including cycling and reducing the dependence on transport infrastructure.

1278. The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure.

Climate Change Resilience Summary

1279. The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

Conclusion on Sustainability

1280. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process

relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

1281. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1282. Compared to the assessed retrofit options with limited extension potential, a redevelopment option could result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding harmful interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. A lower new build option might be able to deliver the same sustainability benefits with less absolute carbon impacts - the highest due to the proposed size - however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.

1283. The energy strategy has been optimised for the site and a BREEAM “excellent” rating is targeted, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining 64% of the existing substructures (by mass) and 39% of the existing superstructure, as well as designing for longevity, adaptability and low maintenance. The proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. However, the proposal demonstrates that on-site carbon emission savings have been maximised and offset payments will be made to mitigate the shortfall to reach the net zero carbon target. The proposed development therefore is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies

DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1284. London Plan Policy D11 (Safety, security and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – defer 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 wider area.

1285. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism.

1286. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to nighttime uses.

1287. The submission sets out the security proposals to protect the building and its users. The City Police have been consulted on the submission and have provided a number of comments and advice to the applicant. This includes ensuring there is sufficient access controls into different areas of the buildings and at different times, sufficient natural and formal surveillance and sufficient safety and management of accessible terraces.

1288. The applicant has confirmed they will engage with the Police during the next design phase of the project, to ensure their comments and recommendations are taken into account.

1289. A security Risk Assessment and Concept Security Strategy have been produced, and these served as the baseline for design and follows a best practice methodology aligned to the NPSA guidance. This demonstrates a clear commitment to ensuring security as a priority in the development of the proposals detailed design.

1290. It is recommended to secure full details of security measures by condition and within the various management plans which would be secured in the Section 106, which would be assessed in consultation with the City Police Design out Crime

and Counter Terrorism teams. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan Policy D11, Local Plan 2015 policies DM3.2, DM3.3 and DM3.5.

Suicide Prevention

1291. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE4 'Terraces and Elevated Public Space' of the draft Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1292. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:

> K2 –(A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
>
> (B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1293. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.

1294. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can used as a step by vulnerable individual.

1295. In order to further protect from the risk of suicide, the suicide prevention advisor has recommended that for the lower level terraces, the balustrade be at least 1.6m in height, and for the upper levels that the barrier is at least 2.8m. It is also recommended that roll bars are used at the top of these. They have also recommended security measures, including CCTV, motion activated lighting, and security staff training on suicide prevention.

1296. The proposal includes a publicly accessible terrace at level 9, where the urban farm is proposed to be located. This terrace has a large planted buffer to the edge, and furthermore, the level 8 terrace is below this which would likely discourage any suicide attempts.

1297. Privately accessible tenant terraces are proposed at 4th, 5th, 6th, 7th, 8th, 9th, 22nd, 36th and 40th level. The staggered nature of the lower level terraces would discourage suicide attempts. Furthermore the balustrades would be 1.8m in height, and it is suggested by the City Suicide prevention advisor that they be fitted with rolling bars to the to make them harder to climb. The 22nd, 26th and 40th level balustrades would be 2.8m and also fitted with roll bars to make them harder to climb. Final details of suicide prevention measures, including balustrade heights are recommended to be secured by condition.

1298. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the draft City Plan 2040.

Health Impact Assessment

1299. Policy HL9 of the draft City Plan 2040 requires major development to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

1300. Policy GG3D of the London Plan states that *"to improve Londoners' health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and* Development *Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments".*

1301. The application is accompanied by a Health Impact Assessment (HIA) (Quod, January 2024) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.

1302. The HIA has been based on the London Healthy Urban Development Unit (HUDU) Planning for Health Guidance (2019) to develop a comprehensive assessment outlining how the proposed development could impact on health.

1303. The HIA concludes that the development overall has a positive impact on health. Positive impacts include:

- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment
- Provision of flexible community/education/cultural space meeting an identified need in the area;
- 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;
- A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above);
- Provision of new open space at James' Court and external building terraces providing much needed amenity provision;
- Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
- Inclusivity and accessibility as placemaking principles;
- Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity;

- The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards
- BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures.

1304. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised and potential adverse effects are avoided, for example by:

- Implementation of a Travel Plan to maximise uptake of active travel options secured by a suitably worded planning condition / planning obligations;
- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight secured by a suitably worded planning condition / planning obligation;
- Implementation of a Construction Environmental Management Plan (CEMP) to minimise construction impacts including dust, noise and vibration secured by a suitably worded planning condition
- Implementation of a Construction Logistics Plan (CLP) (included within the CEMP) to minimise the environmental and road traffic related impacts of the demolition and construction works secured by a suitably worded planning condition;
- Suitably worded planning obligation(s) to secure terms of use for the Sui Generis community/education/cultural floorspace;
- Suitably worded planning obligation(s) to secure local employment and training initiatives (a local training skills and jobs brokerage contribution, and strategy);
- An Air Quality and Dust Management Plan (AQDMP) to minimise impact of dust at the construction stage secured via a suitably worded planning condition; and
- The requirement for Operational Noise Management Plans to minimise noise at the operational phase / commercial uses secured via a suitably worded planning condition.

1305. Potential impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1306. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and draft City Plan 2040 Policy HL9.

Fire Statement

1307. A Fire Statement has been submitted outlining the fire safety strategy for the building.

1308. The City District Surveyor's office has reviewed the submitted statement and has confirmed that this in accordance with Policies D5 and D12 of the London Plan. The Fire Statement is therefore acceptable for the planning stage and would be secured by condition.

Assessment of Public Benefits and paragraph 208 NPPF balancing exercise

1309. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.

1310. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 205 and 206).

1311. The proposal would cause a low level of less than substantial harm to the significance of Holland House through the infilling of the upper levels of the atrium.

1312. The proposal would trigger paragraph 208 of the NPPF, which states '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*.

1313. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a listed building and weighing that harm against the benefits. The decision maker does not have go about balancing harm against benefits in a particular way.

1314. The National Planning Practice Guidance states that "*public benefits…could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not*

always have to be visible or accessible to the public in order to the genuine public benefits".

1315. The key social, environmental and economic public benefits of the proposal are considered to be as follows:

Economic Benefits:

1316. Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the provision of 34,584 sq.m (GIA) of Grade A office floorspace and circa 2,470 FTE jobs, and increased spending in the locality boosting local businesses and a post-covid resurgence. This is a benefit which should be afforded substantial weight.

1317. The provision of 1,170sqm of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities would fulfil the City's vision to providing inclusive workspace. This would be an inclusive offer which will attract smaller and more diverse businesses including SMEs to the City Cluster.

1318. Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. Heneage Arcade, would be aligned with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans. These spaces could also be utilised as small workshop and retail units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development as well as provide amenity space for the wellbeing of workers, residents and visitors.

1319. The proposed multi-functional bookable spaces would provide flexible educational/ cultural/ community/ sports/ multi-faith space creating a compelling and inclusive public offer in the cluster in line with the Destination City agenda.

1320. The overall quality of the development, improved public realm and proposals offer would attract visitors, increase tourism, support and improve worker productivity.

1321. Collectively, but primarily the Grade A office floorspace and employment provision, given their nature and extent, the aforementioned benefits, are attributed substantial weight.

Environmental benefits:

1322. The proposed building would result in a significant aesthetic enhancement to the Creechurch locality. The proposed building would, at ground floor level, present a sophisticated, dark blue faience elevations of a triple order to the surrounding townscape, complementing the existing warehouse buildings of brick with terracotta detailing which characterise the Creechurch locality. Through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area. This is a benefit that would attract moderate weight.

1323. The proposal would result in a low level of enhancement to Holland House through the works to its primary facades and the re-presentation of its heritage lobbies. The proposal would result in a low level of enhancement to the Creechurch Conservation Area through the reinstatement of the lost southern leg of the historic Heneage Lane through the creation of the Heneage Arcade. Together these would attract moderate weight.

1324. Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys. This includes;

- A north-south route through the building is proposed, which would re-introduce a historic connection between Heneage Lane and Bury Street.
- James' Court, which incorporates improvements to this public open space.
- Within the public realm it is proposed to incorporate temporary and permanent art installation program to showcase work of local artists'. (secured by a S106 obligation).

1325. Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane. These improvements would be secured via a section 278 agreement.

1326. Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM ‘outstanding’, reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. The proposed building is a fossil-fuel free, all electric building with zero combustion on site. This is a benefit that would attract moderate weight.

1327. The abovementioned benefits should be afforded moderate weight.

Social Benefits:

1328. The provision of a dedicated community/cultural/ educational/ multi-faith/ sports space within the lower ground, ground and first floors of the three buildings. This space is specifically designed for local groups, including schools and other education uses, charities and cultural/art groups. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours free of charge. These multi-functional bookable spaces would attract a wide range activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space as an outreach, training and skills centre. It therefore offers the potential to make a significant contribution towards training and skills opportunities in the City. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner.

1329. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City Cluster.

1330. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art.

1331. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community.

1332. The proposal would contribute towards affordable housing by making a contribution in leu of £1,482,723.00.

1333. The above social benefits are collectively afforded substantial weight.

Conclusion

1334. When applying the policy in paragraph 208 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report, namely the harm to the significance of Holland House through the roofing over and partial infilling of its atrium.

1335. It is the view of officers that ascribing weight to the public benefits as set out above, including delivering accommodation for City type businesses thereby contributing to economic growth, and other social and environmental benefits, and giving great weight to the conservation of designated heritage assets and therefore to the less than substantial harm to their significance and considerable importance and weight to the desirability of preserving the listed building and its setting, the public benefits of the proposal outweigh the harm to significance of heritage assets as identified in this report.

1336. On that basis there is clear and convincing justification for the harm, and the presumption against granting planning permission is rebutted, the outcome of the paragraph 208 NPPF heritage balance falls in favour of the proposal, and policy D9C(1)(d) in the London Plan is also complied with.

Planning Obligations and Community Infrastructure Levy

CIL and Planning Obligations

1337. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1338. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1339. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2

under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

1340. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£4,980,808.88	£4,781,576.53	£199,232.36

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,246,550.00	£2,134,222.50	£112,327.50
City Planning Obligations			
Affordable Housing	£1,497,700.00	£1,482,723.00	£14,977.00
Local, Training, Skills and Job Brokerage	£898,620.00	£889,633.80	£8,986.20
Carbon Reduction Shortfall (*as designed*) *Not indexed*	£219,450.00	£219,450.00	£0
Section 278 (Initial Evaluation and Design Fee but any excess costs will also be secured) *Not indexed*	£100,000	£100,000	£0
Security Measures Contribution (Eastern City Cluster)	£299,540.00	£296,544.60	£2,995.40
S106 Monitoring Charge	£5,750.00	£0	£5,750.00
Total liability in accordance with the City of London's policies	**£5,267,610.00**	**£5,122,573.90**	**£145,036.10**

1341. City's Planning Obligations

- The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Cycle Improvement Contribution (TfL) (£100,000.00)
- Highway Reparation and Highway Obligations
- Local Procurement Strategy

- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Delivery and Servicing Management Plan (including Consolidation and provision of accessible parking space)
- Active Travel Plan
- Carbon Offsetting Document Submissions
- 'Be Seen' Energy Performance Monitoring
- Provision of the Cultural, Education, Sports and Community Spaces and an Implementation Strategy
- Provision of the Mixed Affordable and Free Workspace and the submission of a Management Plan
- Provision of Public Art and the submission of a Management Plan
- Provision of the Climbing Wall and the submission of a Management Plan
- Provision of the Cycle Repair Workshop and Practical Skills Space and submission of a Management Plan
- Provision of the Creechurch Hall and Holland House and submission of a Management Plan
- Utility Connection Details
- Television Interference Survey
- Wind Audit
- Solar Glare Assessment
- Construction Monitoring Costs (£53,820 for the First Year and £46,460 for Subsequent Years)
- A10 Contribution (*TfL*)
- Changing Places Management Plan
- Provision of the Public Route at Heneage's Arcade, Public Access to St James' Court and provision of the Management Plan
- Section 278 agreement

1342. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

1343. The scope of the s278 agreement may include, but is not limited to:

Creechurch Lane

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Improvements to highways drainage

- Provision of road markings and associated traffic orders, relocation of parking bays (if required)
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Bury Street

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Removal of redundant vehicle crossing
- Improvements to highways drainage
- Provision of road markings and associated traffic orders, relocation of parking bays (if required)
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Mitre Street Junction with Creechurch Lane

- Reconstruction and widening of the footway, as per the City's approved materials
- Resurfacing and raising of the carriageway

Heanage Lane

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Reconstruction and raising of the carriageway, as per the City's approved materials
- Improvements to highways, footway and drainage
- Provision of greenery

And any other associated works necessary to deliver the above scope of Works

Monitoring and Administrative Costs

1344. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1345. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Impact on the Foundation of the Synagogue and Ground Movement

1346. Representation have been received raising concerns about the impact the proposed development would have and potential damage it would cause to the Bevis Marks Synagogue's Foundations.

1347. The applicant has submitted a Structural Report and Basement Impact Assessment. The report has assessed the impact from basement excavation to the nearby receptors, including Bevis Marks Synagogue, Holland House, Renown House, Valiant House and 33 Creechurch Lane. With regards to the Bevis Marks Synagogue negligible ground movement is predicted and this is to be classed as Category 0 'negligible', the lowest possible category.

1348. The report also stated that throughout the development of the design, any risks identified will be brought to the attention of the design team and client in various reports and on the drawings. The risk assessment will continue to be developed in future design stages giving details of how risks will be eliminated or reduced. Ground movement would be continually monitored throughout the demolition and construction process. With regards to monitoring, the report states that frequent monitoring of neighbouring properties to be carried out during excavation, to validate ground movement predictions against reality.

1349. The submitted assessment was previously reviewed by District Surveyor, who advised that due to the fact that the Synagogue is located some distance from the proposed development, there would be no material impact to its foundations. Notwithstanding, a condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

1350. The City, as a public authority must, in exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1351. Section 149(3) of the 2010 Act provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1352. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

1353. The application is supported by an Equality Statement, which considers the potential equality impacts related to the proposal. The CoL, as the planning authority, have the duty to consider potential equality impacts. The purpose of the Equality Statement (EqS) was to provide information for the planning authority to carry out its role. To ensure that the methodology and data used in the Equality Statement, ensure that all relevant matters have been taken into consideration, and the conclusions and recommendations suggested in the EqS are robust, a third party has been instructed to review this document.

1354. In terms of the methodology used to assess any potential equality impacts, the following has been adopted in the EqS.
- A differentiation between disproportionate and differential impacts relevant to equality upon persons who share a relevant protected characteristic compared to persons who do not share it. These impacts are assessed qualitatively. Therefore, to assess any such impacts, a decision maker should balance a range of positive and negative impacts of different types.

    - Disproportionate: there may be a disproportionate equality impact where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
    - Differential: there may be a differential equality impact where people with a protected characteristic are affected differentially to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- The EqS assessment of potential equality impacts is focused on the following, during both the construction and end use where relevant:
    - Noise
    - Air quality
    - Transport impacts
    - Daylight and sunlight
    - Access to community facilities
    - Employment and skills
- These aspects have then been grouped into four key considerations of potential equality related impacts:
    - Amenity disruption during construction
    - Community uses and accessible design
    - Employment creation
    - Impacts upon places of worship
- These aspects have then been considered in relation to their potential impact on protected characteristics. Consideration was then given to any action that needs to be taken to mitigate any adverse impacts or to promote equality of opportunity.

1355. To prepare the EqS the consultant has confirmed that they used the CoL Public Sector Equality Duty toolkit. The toolkit suggests a number of questions/considerations to identify potential impacts on protected characteristic. These question were adopted and amended appropriately in the EqS to be relevant to the current scheme.

1356. Overall, the third party reviewer considers that the policy context and methodology are deemed appropriate for the assessment of equality impacts relating to the proposed development. The suggested mitigation measures to address the impacts are also considered appropriate.

1357. A range of datasets and sources have been used including Census 2021, Annual Population Survey 2022, ONS Live Births 2021 and Index of Multiple Deprivation 2019.

1358. In summary, in terms of demographics, the City has a significantly higher workday population compared to its residential population. There is a limitation in

EqS identifying all protected characteristics for the working population. With regard to residents, the City's resident population is generally comprised of younger working age with proportionately fewer children living here. However, it is noted that the Aldgate School and City Child and Family Centre are in close proximity to the Site. In terms of sex, there are disproportionately more men living and working in the City compared to women. The population living in the City is less racially diverse compared to London's average in terms of ethnicity. However, there are a higher proportion of residents not born in the UK, with a higher proportion of residents born in Europe and the Americas and Caribbean. In terms of religion and belief of residents there are no disproportionately high representations of any particular religion or faith compared to London's average. However, the site is in close proximity to a number of places of worship, including a number of churches and a Synagogue in very close proximity to the site. When it comes to deprivation, no area within the City falls within the top 20% most deprived areas within England. However, an area to the north and east of the site within the City is within the 30% most deprived (the area around Aldgate). Within this area, deprivation relating to income, employment and barriers to housing and services is more severe. No disproportional representation of the population has been identified in the City in terms of disabilities. On the basis of the above, the protected characterises that have been identified for potential disproportionate impacts included age, sex, sexual orientation (high number of population identified as of another sexual orientation than heterosexual), race, religion and belief.

1359. Consideration has also been given to the key community infrastructure within a 500 metres radius from the site. There is a high number of places of worship, including churches and two Synagogues (the Bevis Marks Synagogue in close proximity to the application site and Sandys Row Synagogue, which is outside the boundaries of the City of London) and also some educational facilities in close proximity to the site.

1360. Overall, demographics of the area have been described in a succinct way. The third party reviewer considers that the baseline context chapter is sufficient for outlining the context of the area in relation to the protected characteristics. Additional detail and more recent data could be included in this section. However, the inclusion of this is unlikely to change the conclusion of which protected characteristics should be considered for potential disproportionate impacts. The findings of the baseline analysis and disproportionate impacts are considered appropriate given the supplementary information provided in response to the Clarification Questions.

1361. To consider the equality impacts of the development of individuals or groups with protected characteristics the EqS sets out a series of questions. The assessment follows the methodology set out in the earlier sections of the report, addressing the relevant questions drawn from the City of London's Toolkit.

1362. In considering disproportionate impacts, as identified based on the baseline findings and the sensitivities of protected characteristics within the local area, the submitted EqS suggests that any such impacts would be mitigated via measures secured through conditions and the S106 agreement. Other measures are also included in the submitted Construction Environmental Management Plan, the Design and Access Statement and the Transport Assessment.

1363. In considering the differential impacts, the impacts of the development itself should be considered opposed to the nature of the surrounding population. Four different impacts have been identified in the EqS and these relate to the following:

- Amenity disruption during construction – There are people with some protected characteristics, such as age, disability, pregnancy and maternity, that may be more affected during demolition and construction due to the potential lengthier time spend at home.
- Community uses and accessible design – there are people with some protected characteristics, such as age, religion or belief, pregnancy and maternity and disability, that may differentially benefit from access to community space and improvements in accessibility, and likewise differentially suffer from lack of access to community space and poor accessibility.
- Employment creation - The EqS considers that there would a positive impact in terms of employment creation, albeit benefit people with different protected characteristics in ways that are difficult to predict as they depend on the actions of future employers. Whilst it is accepted that the increase in employment would be a benefit for the City as one of the world's leading international financial and business centres, the benefit to groups with protected characteristics is not clear to officers.
- Impact on places of worship – there are a number of places of worship in the vicinity of the site. Impacts of the proposed development may have differential impacts on the protected characteristic of religion or belief due to how these spaces are used for religious ceremonies. It should be noted that during the process of the application additional information has been submitted by the applicant to address matters related to impact of the development on places of worship and in particular the Bevis Marks Synagogue.

1364. With respect to the equality impacts during construction, it is expected that all properties in close proximity to the site would have the potential to disproportionately affect people with some particular protected characteristics, for example older or younger people, women during pregnancy, people with disabilities that are more likely to spent longer time at home. Disproportionate impacts will potentially also experience the congregation of the Bevis Marks Synagogue, in relation to the protected characteristic of religion and belief, due to

the proximity to the site. Any footway closure during demolition/construction would also potentially differentially affect people with mobility challenges.

1365. Overall, any equality impacts on amenity during demolition/construction would be temporary and will be able to be mitigated as far as possible though management plans and other mitigation measures, which will be secured by conditions and S106 obligations.

1366. With regard to community engagement, the applicant has complied with the advice as set out in the Statement of Community Involvement for pre-application engagement. The pre-application engagement that the applicant has carried out is extensively described in the 'Statement of Community Involvement' section of the report. Engagement has included targeted outreach to define the uses of the proposed space within Holland House. The Equality Statement outlines the groups and relevant points raised during this process. The Local Planning Authority has carried out its duty for consultation and publicity of the application in accordance with The DMPO 2015, The Town and Country Planning (Consultation) (England) Direction 2024, The TCPA 1990, The EIA regulations 2017, The Mayor of London Order 2008 and the Act and Regulations for Listed Building and Conservation Areas 1990.

1367. Through engagement with education providers, community cultural, arts and faith-based groups, spaces within the Holland House, Renown House and the proposed tower element have been dedicated for community uses, namely a total of 1, 411 sqm of floor space. Consideration has been given to the accessibility of all those uses, as well as the commercial floorspace.

1368. The development would also provide affordable co-working space for the local community/businesses/charities (1,176 sqm GIA). This will be provided in the restored Holland House and will include 60 desks alongside meeting rooms, and will be 50% of market rent for qualifying occupiers and zero rent for charities secured for the lifetime of the development.

1369. Following negotiations with the applicant, a blue badge parking bay will be provided on site, to address the equality impacts of people with limited mobility. The provision and effective management of this parking bay will be secured by condition and S106 obligation respectively.

1370. Recumbent cycle spaces are proposed alongside accessible showers and toilets within the basement, accessed via a recumbent cycles accessible lift.

1371. It is the view of officers that the proposed development would reduce barriers to access for disabled people through the provision of an enhanced and step-free community/ cultural/ faith/ educational/ amenity space and public realm. It is also

the view of officers that the provision of accessible office floorspace including affordable workspace, and publicly accessible community/cultural/ faith/ educational space would advance equality of opportunity.

1372. The EqS addresses the equality impacts on places of worship focusing on the impacts that may affect religious activities. It is stated that the Bevis Marks Synagogue may be affected by the proposed development in a number of ways, including townscape and visual impact, noise, daylight and sunlight and overshadowing. It is noted that considerations that relate to the significance of the Synagogue from a heritage perspective and its importance as a Grade I listed building do not form part of the scope of the EqS. Officers concur that although material planning considerations, any such impacts are not relevant to equality impacts and are addressed separately in the relevant heritage section of the report. Further concerns regarding the impact of the development on the visibility of the night sky and in particular the moon have been submitted by the Synagogue's representatives. A Lunar Transit Study has been prepared by the applicant and reviewed by a third party on the CoL's instructions to respond to those concerns. The aforementioned equality impacts are addressed in turn below.

1373. The proposed development will alter the visual backdrop to the Synagogue from its courtyard, which is considered essential part to the visitor experience. However, it is considered that the townscape, heritage and visual impacts would not be significant (minor effect neutral in nature). These impacts are further assessed in the relevant heritage section the report. These impacts, although material planning considerations, are not considered impacting in the religious activities of the Synagogue and therefore, are not considered resulting in a disproportionate or differential equality impact. The impact on the visibility of the night sky is assessed below.

1374. The differential impacts on religion and belief due to noise impacts, by reason of the proximity of the site to the Synagogue are discussed above. The Noise and Vibration Assessment concludes that the impact during demolition and construction will be negligible (not significant). Nonetheless, the Construction Environmental Management Plan will require the contractor to have close regard to the religious calendar to limit disruption during religious events. At operation stage, an Operational Noise Management Plan would be developed to manage the end uses. The details of both plans will be secured by condition.

1375. An extensive assessment of the daylight, sunlight and overshadowing impacts to the Synagogue and its courtyard are addressed in the relevant section of the report. Consideration of daylight levels within the Synagogue is sensitive due to the context of the reliance primarily on candlelight during religious ceremonies where the congregation need to be able to read from the Torah. There are 29

windows serving three rooms in the Synagogue, the central area, the gallery and the exhibition/visitor centre. The gallery is used by Jewish women for prayer and worship (the 'Ladies Gallery'). Concerns have also been raised around the equality impact that the development would have to older people using the Synagogue as a place of worship, due to their need of additional light to read text of the same size as younger people. Therefore, any significant impact could have a disproportionate impact on the protected characteristics of sex, age and religion or belief. The finding of the assessment of the daylight shows a minor adverse (not significant) effect in the existing vs proposed scenario, which is increased to minor to moderate (significant) effect in the case of the existing vs cumulative (including the proposed development) scenario. It should be also noted that due to the low height of the Synagogue in comparison to its existing surrounding buildings, it already receives relatively low levels of light. Although the southern section of the gallery would experience some reductions due to the proposed development, these would be localised on the southwest section of the gallery, and the Synagogue also receives light from several other windows to all elevations. Furthermore, as discussed in the relevant daylight and sunlight section of the report, the applicant has submitted a qualitive assessment, namely the Radiance Assessment, that shows that the daylight impacts would be almost imperceptible between the consented schemes and the consented schemes with the proposed development. Effects on sunlight were found to be negligible.

1376. Although due regard is given to the equality duty of the Corporation with respect to this place of worship, it is the view of officers, taking into consideration all material factors into consideration, that daylight impact would not be such that to cause an adverse effect on the ability to manifest religion in worship in the Bevis Marks Synagogue. In the Advice on the Equalities Statement dated 18th November 2024 (submitted as part of the representations made by the S&P Sephardi Community) it is said that the Equalities Statement fails to address the potential daylight and sunlight impact on the ability to continue to carry out circumcisions at the synagogue. The impact on the ability to carry out circumcisions is considered earlier in this report. The conclusion reached is that the proposal's impact on light levels would not diminish the ability of the Synagogue to function or prevent any of the activities within, including circumcision, to be undertaken. The CoL have taken positive steps to advance equality of opportunity by undertaking a detailed assessment of the impacts of the proposal on the use of the synagogue and on other places of worship. It is considered that the impacts of the development would be limited and would not adversely affect the Synagogue as a place of worship and it would not result in a disproportionate impact on the protected characteristics of sex, age and religion or belief.

1377. It has been highlighted that the since the courtyard was formed in 1699 it has hosted generations of religious events and it is therefore, considered important for the congregation. It is noted that the courtyard has recently undergone a number

of alterations, including the introduction of a ramp, a security booth and ticketing booth in association with the exhibition centre. These structures have reduced the usable area of the courtyard.

1378. The baseline analysis in the overshadowing assessment indicates that the courtyard currently experiences low levels of sunlight given the dense urban environment and nearby high rise buildings. At the equinox (21 March and 21 September) the courtyard receives virtual no direct sunlight. On the basis of the BRE guidance the development would result in negligible effects at all scenarios. The applicant has assessed the impacts of the development on the courtyard beyond the BRE requirements. In April to August, there is greater access to sunlight currently with the northern corner of the courtyard receiving up to three hours of direct sunlight. This position is reduced when considering consented development in the surrounding area. With the proposed development the sunlight availability in the courtyard is very similar to that in the consented position. For the other half of the year (September until March) are as low as in the baseline scenario. In respect of average sunlight availability in the proposed development scenario (including cumulative schemes), which is based on a 'clear sky' assumption, the results show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when compared to the consented scenario. Overall, it is considered that the impact of the proposed development to the sunlight received in the courtyard is limited and it would not restrict the use of the space for religious purposes.

1379. One of the concerns raised by the Synagogue's representatives was the loss of views of the moon in the night sky above Bevis marks Synagogue. In particular Rabbi Shalom Morris states that, "*Each month, Jews gather outside after dark to recite kiddush levana, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer. This is a direct obstruction to our freedom of worship as we have enjoyed it in this place since 1701*". In the Advice on the Equalities Statement dated 18th November 2024 (submitted as part of the representations made by the S&P Sephardi Community) it is said that the Equalities Statement is silent on the importance of the night sky view to the weekly observance of Shabbat, the daily obligation to recite the Shema Yisrael and the monthly blessing on the appearance of the new moon. It is understood that this is an important element for Jews to manifest their religion from the Bevis Marks Synagogue and in particular its courtyard.

1380. In the letter received by the Sephardi Community and the Rabbi of the Bevis Marks Synagogue, dated 14 November 2024, further details about the Kiddush prayer, the uniqueness about reciting the prayer at the Bevis Marks Synagogue and the how the ritual has been recorded and altered in Europe have been submitted. It is stated that "*The prayer is recited whilst standing outside, under an*

open sky, and requires sight of the moon. If the moon is blocked by either buildings or clouds, the prayer cannot be recited. However, if the moon is visible *through a cloud, one can still recite the prayer… Kiddush Levana takes about fifteen minutes to recite. It is typically recited following the evening service at a synagogue".* It is also stated that at Bevis Marks Synagogue in particular "*Kiddush Levana is ideally said from day seven of the lunar cycle until the middle of the month…When climactic conditions are difficult, it is permitted to recite even from day 3*". With regard to the payer, it is noted that "*For European Jews, cloud cover, a common concern, was seen as a bad omen, whilst a clear night was considered a positive sign, as the prayer for renewal could then be recited. Finally, proximity in the northern hemisphere has made the recital of 'Kiddush Levana' notoriously difficult in locations like England during July and August with it short summer nights and associated lower arc of the moon*".

1381. Since the receipt of the abovementioned objections, the applicant has commissioned a Lunar Transit Study to assess the impact that the development would have on the visibility of the moon in the night sky. Subsequent information including an additional analysis from a new viewpoint has been submitted following a site visit to the Synagogue and discussions with the Rabbi of the Synagogue and the Corporation's officers and appointed independent reviewer. The Lunar Transit Study and subsequent additional information have been reviewed by a third party consultant on behalf of the City.

1382. The methodology used in the study submitted by GIA takes into consideration the lunar path, describing minor and major lunistice as seen from a specific location across a full 18.6-year lunar cycle. This approach has been considered relevant and appropriate by the independent reviewer. The moon phases and positions (daytime and nighttime) reported in the GIA material have been checked against published data and appear to be accurate.

1383. It is understood from the submitted study, the review, discussion with the Synagogue's Rabbi and the details included in recently submitted letter by the Sephardi community, that in order for Kiddush Levana to be recited the moon would have to be visible, including through any cloud cover and not covered by clouds. For that reason, the submitted study has taken into consideration the probability of cloudiness in London to estimate the likelihood of the moon to be visible. As this information has been applied using date on a monthly than daily basis, the independent reviewer has advised this would not be able to capture daily variations. It has therefore been advised that this information is treated with caution. The Rabbi has also raised concerns in the use of cloud cover for the assessment of the lunar visibility. For the assessment below the impacts are assessed discounting cloud cover.

1384. Three scenarios have been tested for the study including

- the baseline, which contains the current context without consented or proposed developments;
- future baseline, which contains the current context and currently consented developments; and
- cumulative, which contains the future baseline scenario with the proposed development.

1385. The future baseline scenario includes, most relevantly, the consented and implemented scheme at 100 Leadenhall Street. The implementation of this scheme means that the permission is extant and this is why the proposal has been measured against it in the 'future baseline' scenario. It is relevant to note that the transit of the moon was not assessed or considered (nor raised as a theme of objection) in relation to that scheme, which was originally granted permission in 2019 and implemented in early 2024.

1386. Two observer points, at the entrance of the Synagogue courtyard, have been tested. One of them was originally included in the submitted study and one was thereafter assessed, following consultation with the Synagogue's Rabbi. Observer point P is 0.53m higher than location N. The applicant has confirmed that this height variation has been taken into consideration and that the 3D modelling reflects the accurate terrain of the courtyard.

1387. The assessment, following request from the Corporation's appointed independent reviewer, provides charts for 15-day periods between the new moon and full moon for each month in 2024 and 2034, with clear sky conditions, while also considering only the 12-day periods of the waxing moon when it is understood that Kiddush Levana prayer is recited. These have been tested for both observer points. It has been confirmed that the data used by the applicant for the moon phases and positions are accurate. The site measurement results taken for the Corporation's appointed independent reviewer confirm that the cylindrical projections reported in the GIA material correctly reflect the actual geometry of the existing buildings as seen from the two observer locations.

1388. Based on the results produced taking into account the lunar bracelet visibility throughout the 18.6-year lunar cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistice respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistices from both points.

1389. In relative terms, in the existing vs cumulative scenario, the opportunity to view the moon within a full moon cycle (not accounting for cloud cover probability) from observer location P, would be reduced by between 49% (at a major lunistice) and 52% (at a minor lunistice), or by 51% on average throughout a full lunar cycle. The same opportunity to view the moon from observer location N would be reduced by between 41% (at a major lunistice) and 51% (at a minor lunistice), or by 46% on average throughout a full lunar cycle. The relative reductions in the future baseline vs cumulative scenario would be 42% for observer location P and 33% for observer location N, on average throughout a full lunar cycle. It is important to recognise that large relative percentage alterations, regardless of the very low absolute losses, are as a result of the existing low levels of visibility of the moon.

1390. When accounting for cloud cover probability the relative loss of moon visibility would not change significantly. Overall, there would be less than a 1% difference in results on average across all assessment scenarios considered for both observer locations, compared to the previous stage of assessment which did not account for cloud cover probability.

1391. At existing baseline scenario, the results show that the moon is visible for 9 months and 63 days each year from viewpoint P, indicated by the Rabbi, at a major lunistice year and 61 at a minor lunistice year. Under both the future baseline and cumulative scenarios, the moon would be visible for 8 months and 50 days each year on both major and minor lunistice years. When considering the impact of the proposed development against the future baseline scenario, the moon would be visible for 8 months in each year and the number of days would be reduced by two (from 52 to 50 days) in the case of the major lunistise year and by one (from 51 to 50 days) in a minor lunistice year. In terms of hours there will be a reduction of approximately 41 hours (from 82hrs 30min to 41hrs 45min) in a major lunistice year and approximately 46 hours (from 86hrs 30min to 39hrs 45min) in a minor lunistice year. This is clear in the following tables prepared by the CoL's appointed consultant.

Table 5 – Number of days and hours when the moon would be visible from observer location P on nights with clear sky conditions during 12-day periods of waxing moon throughout 2024 (a major lunistice year). Based on the charts reported in Appendix 2 of the final GIA addendum.

Period	Existing baseline scenario		Future baseline scenario		Cumulative scenario	
	Days	Hours	Days	Hours	Days	Hours
14 Jan – 25 Jan	11	20hrs 15min	10	16hrs 45min	10	9hrs 45min
12 Feb – 24 Feb	11	18hrs 45min	11	15hrs 15min	10	8hrs 30min
13 Mar – 25 Mar	11	19hrs 30min	10	16hrs 45min	9	8hrs 15min
11 Apr – 23 Apr	8	12hrs 45min	6	10hrs 15min	6	4hrs 30min
11 May – 23 May	4	3hrs	2	2hrs	2	30min
9 Jun – 22 Jun	2	30min	-	-	-	-
8 Jul – 21 Jul	-	-	-	-	-	-
7 Aug – 19 Aug	-	-	-	-	-	-
6 Sep – 18 Sep	-	-	-	-	-	-
5 Oct – 17 Oct	4	4hrs 30min	3	3hrs 30min	3	1hrs 15min
4 Nov – 15 Nov	4	7hrs 30min	3	6hrs 30min	3	3hrs
4 Dec – 15 Dec	8	14hrs 15min	7	11hrs 30min	7	6hrs
Total 2024	**63**	**101hrs**	**52**	**82hrs 30min**	**50**	**41hrs 45min**

The periods considered in the results do not include the first 72 hours following each new moon.
The number of hours is rounded to the nearest quarter of an hour.

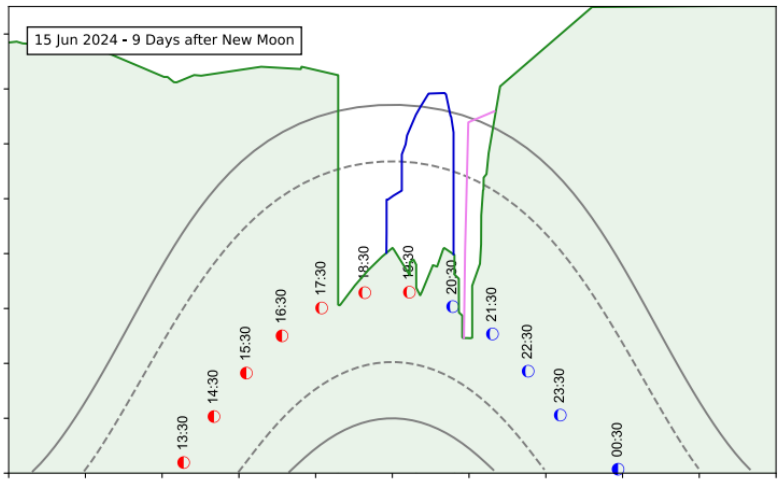
Table 6 – Number of days and hours when the moon would be visible from observer location P on nights with clear sky conditions during 12-day periods of waxing moon throughout 2034 (a minor lunistice year). Based on the charts reported in Appendix 2 of the final GIA addendum.

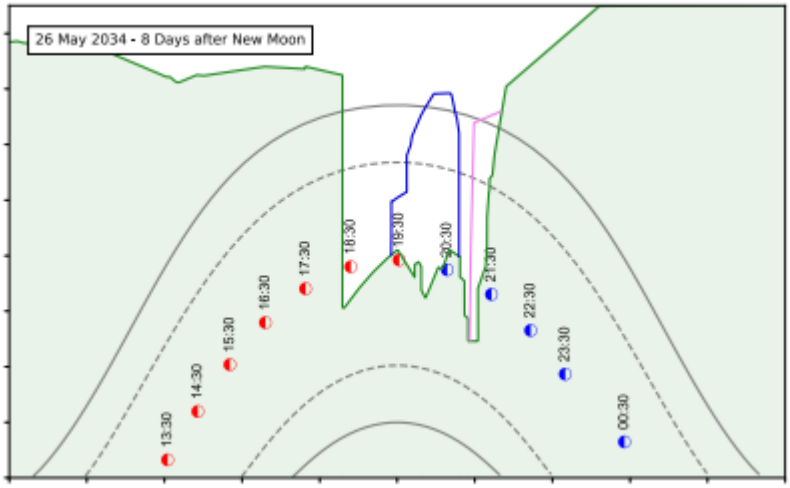
Period	Existing baseline scenario		Future baseline scenario		Cumulative scenario	
	Days	Hours	Days	Hours	Days	Hours
23 Jan – 3 Feb	11	21hrs 45min	10	18hrs 30min	10	8hrs 45min
21 Feb – 5 Mar	11	20hrs 15min	10	17hrs 30min	9	7hrs 45min
23 Mar – 3 Apr	10	17hrs 30min	9	14hrs 15min	9	6hrs 45min
21 Apr – 3 May	7	9hrs 45min	5	8hrs	5	3hrs
21 May – 2 Jun	2	45min	-	-	-	-
19 Jun – 1 Jul	-	-	-	-	-	-
18 Jul – 31 Jul	-	-	-	-	-	-
17 Aug – 29 Aug	-	-	-	-	-	-
15 Sep – 28 Sep	1	1hr	1	1hr	1	1hr
15 Oct – 27 Oct	5	6hrs 45min	4	5hrs 30min	4	2hrs 30min
14 Nov – 25 Nov	5	8hrs 15min	4	7hrs 15min	4	3hrs 30min
13 Dec – 25 Dec	9	17hrs	8	14hrs 30min	8	6hrs 30min
Total 2034	**61**	**103hrs**	**51**	**86hrs 30min**	**50**	**39hrs 45min**

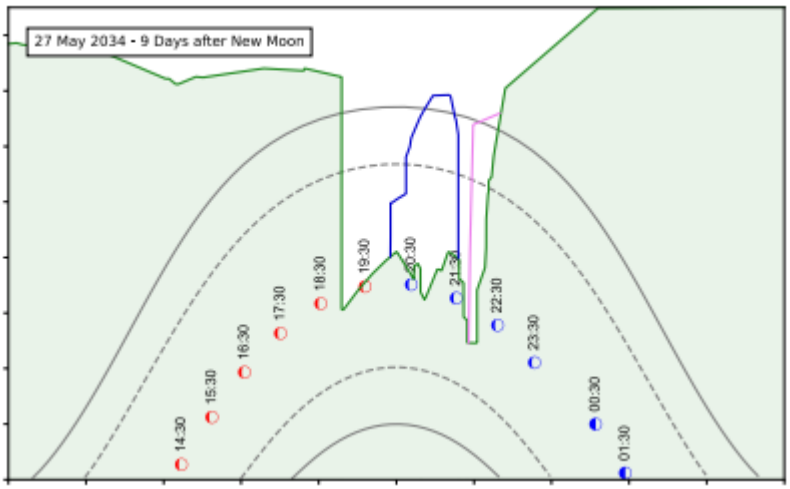
The periods considered in the results do not include the first 72 hours following each new moon.
The number of hours is rounded to the nearest quarter of an hour.

1392. In the two assessed scenarios, namely a major lunistice in 2024 and a minor lunistice in 2034, under existing conditions the moon would be visible for 9 months, as stated above. This would be reduced to 8 months in the future baseline and cumulative scenarios, due to another consented and implemented development (100 Leadenhall) than the proposed development. The moon is currently visible in June during a major lunistice year and in May during a minor lunistice year. In the

future and cumulative scenarios, the visibility of the moon during those two months would be lost. As shown on the graphs below, submitted as part of the Lunar Transit Study and also independently reviewed, it is clear that this loss would be primarily due to the building marked in pink (100 Leadenhall) rather than the building marked in blue (proposed development).







1393. In light of the above assessment, it is concluded that currently, in the existing condition, there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings.

1330. Although the development would result in high relative losses of the visibility of the moon, the absolute reductions would be limited. Based on the analysis, the third-party reviewer considers that the loss of the visibility would be significant. However, it is noted that the moon would still be able to be viewed from the Synagogue's courtyard in the same number of months (8 months in each year) and almost the same number of days (50 instead of 52 in each year) when considering the impacts of the development against the future baseline. It is therefore, considered that the prayer would still be able to be recited in those same months, which are one month less than the existing baseline scenario. As explained above this reduction in the months that the moon is visible arises not from the proposed development, but from the consented and implemented scheme at 100 Leadenhall Street); and that the moon's transit was not raised as an issue for that implemented scheme.

1331. This impact of the proposed development, in percentage and hour reduction terms, is acknowledged. It would reduce the amount of time on each occasion when the moon is visible for the purposes of the Kiddush Levana prayer, but not the number of months of such occasions when considered against the future baseline; officers conclude that the presence of the proposal would still allow the prayer to be recited. Furthermore, it must be acknowledged that there are already three months of the year in the existing condition when the moon is not visible at all. Nevertheless, this impact on the amount of time available to recite the prayer weighs against the grant of planning permission and this is a matter to which officers give significant weight. In the planning balance and conclusions below, it is assessed whether the benefits of the proposed development are able to outweigh this impact.

1332. The Sephardi community has also advised in their letter regarding the Centrality of Sky View at Bevis Marks to Religious Services and Heritage that the sky view in the courtyard at Bevis Marks serves important ritual purpose as the sky view is central to Jewish practice. One which occurs weekly is the Sabbath, which is determined ended when the average person can see three medium sized stars in the sky. Although it is advised that the congregation tend to rely on the clock when it is cloudy, the view of the three medium sized stars in the sky is still conscious inspection regarding the sabbath times. These timings are central to other aspects of rituals and worship, such as Shema Yisrael which is an obligation every evening must be done only after three medium sized stars are seen in the sky.

1333. The submitted objection states that the Jewish Sabbath concludes at the appearance of three stars which first appear in the darkening eastern sky. Similarly, it is understood that Shema Yisrael is recited when the first three medium sized stars appear in the darkening eastern sky. The proposed development would be sited to the southwest of the Bevis Marks Synagogue and therefore, the proposed tower element would not reduce the visibility of the eastern sky that is necessary to recite those prayers and therefore, officers consider that it would not prevent these important rituals being undertaken and the Bevis Marks Synagogue and its courtyard to be used as a place of worship.

1334. There are also a number of other places of worship in close proximity of the site, including a number of churches. The one closest to the site is St Katharine's Cree Church 50m to the south of the application site. The environmental impacts on this Katharine's Cree Church have been considered and are not significant. It is therefore considered that the proposed development would not have an adverse effect on the ability to manifest religion in worship in the church and as such, there would be no adverse impact on those who share the protected characteristic.

1335. The EqS sets out a number of actions to mitigate potential impacts arising from the proposed development. Officers consider that any potential impacts from the development relating to demolition, construction and operation of the development would be able to the addressed via the imposition of appropriately worded conditions and S106 obligations.

1336. The applicant has indicated the intention to continue engaging with the Bevis Marks Synagogue and various community stakeholders. It is noted that the Equality Act also carries ongoing responsibilities for the owner which will continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for each buildings and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation. This would include the proposed community/cultural/educational/multi-faith/sports/amenity spaces and affordable workspace which currently do not have any end user finalised. In formulating this offer, the landowner should continue to engage with a full range of key stakeholders so that it is relevant and accessible to all. As referred to in other sections of this report, where necessary, details will be secured by condition and/or planning obligations.

Human Rights Act 1998

1337. It is unlawful for the City, as a public authority, to act in a way which is compatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).

1338. Insofar at the grant of planning permission will result in interference with right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby sensitive receptors. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the Draft City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, together with all other benefits that would arise from the provision of affordable workspace and community and cultural spaces for the public to enhance the role of the City as destination, outweighs the Minor to Major Adverse impacts on nearby residential properties and Places of Worship and that such impact is necessary in the interest of the economic well-being of the country and is proportionate.

1339. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

1340. Insofar as the grant of planning permission will result in interference with freedom of thought, conscience and religion (Article 9 of the ECHR), including the ability of people to attend or wishing to attend the Bevis Marks Synagogue to manifest their religion or belief in worship, teaching, practice and observance, it is the view of officers that the Minor Adverse effect on daylight identified within the Synagogue by the proposed development will not impact upon the ability people to attend or wishing to attend Bevis Marks Synagogue to manifest their religion or belief in worship, teaching, practice and observance.

Conclusion and Overall Planning Balance

1341. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.

1342. The application relates to site located on the northeast corner of Bury Street, northwest of Creechurch Lane and it comprises three buildings, namely Holland House, Renown House and Bury House. The site is located within the recently designated Creechurch Conservation Area and Holland House is a Grade II* listed building.

1343. The current proposal follows the refusal of an application at 31 Bury Street, proposing the demolition of the building at 31 Bury Street and the construction of a 48 storey tower building under the terms of application 20/00848/FULEIA. The application currently under consideration incorporates a tower at 31 Bury Street, which has been reduced in height by 19 metres and has been set back at the top eight floors to reduce the massing towards the termination point of the tower.

1344. The proposal is for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House and interconnection of the three buildings. The buildings would be used for the following purposes office (Class E(g)(i)), including affordable workspace, flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses. The development also includes the provision of a new covered pedestrian route, cycle parking and facilities, public toilet, landscaping and highway improvements and the provision of a single servicing access point onto Heneage Lane.

1345. Objections have been received from statutory consultees including Historic England, the Greater London Authority, the 20th Century Society, the Victorian Society, the Georgian Group, Historic Royal Palaces, the CAAC, SAVE Britain's Heritage, the London Borough of Tower Hamlets, as well as several objections from third parties, including those from the Jewish community, relating to the scale, massing and design of the development and its perceived impact on designated heritage assets, including the Tower of London World Heritage Site, the Bevis Marks Synagogue and the Creechurch Conservation Area and concerns around the perceived ability of

the Synagogue's congregation to use the Synagogue and its courtyard as a place of worship due to the daylight, and overshadowing impacts and by reason of the reduced visibility of the night sky and the moon. This report has considered these impacts in detail.

1346. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The site is within the City's growth modelling and would deliver over 1.5% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.

1347. The scheme would provide 34,584 sq.m (GIA) of office floorspace (Use Class E(g)(i)), which would be sustainable Grade A office floorspace suitable for circa 2,470 FTE City workers. The proposed office floorplates would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses, providing office tenants with their own private entrance and dedicated floor space. An area of 1,170sqm would be provided as affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities, fulfilling the City's vision to providing inclusive workspace.

1348. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

1349. Officers consider the site to be acceptable for a tall building, supporting the consolidation of the City Cluster. While there is conflict with Local Plan policy CS7 (3) and CS14 (2) and London Plan D9 B (3), because the site is

located in a conservation area and therefore considered inappropriate for a tall building, officers nevertheless find that the qualitative impacts of the proposal would be acceptable and that it would accord with London Plan Policy D9 A, C and D, Local Plan Policy CS7 (1,2, 4-7), draft City Plan S12 (1,2, 4-10) S21 (1,3-8). Most relevantly, the proposal would not cause harm to the significance, character or appearance of the Creechurch Conservation Area in which it is situated. As such, officers consider the site appropriate for a tall building, notwithstanding some limited further conflict with emerging City Plan 2040 S21 (5) due to an impact on the significance of the grade II* listed Holland House which forms part of the application site.

1350. The proposal would be a sophisticated new addition to the City Cluster, massed in tapering stages to form an endpiece at the eastern edge, and clad in pale blue faience elevations to do so elegantly and differentiate it from the more glazed towers at the centre. It would enliven the locality of the City at its feet by reinstate the lost leg of Heneage Lane with a new route and retail arcade and reimagining the existing open space between Bury House and Holland House; both these existing buildings on the application site and the new spaces between them (and the wider locality) would be made more accessible, inclusive, inviting, and animated by the scheme. The creation of the proposed new public spaces and improvements to the existing public spaces are considered by officers to be a benefit of the scheme. The proposal would comply with the relevant design policies set out above.

1351. The proposal would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

1352. The proposals would preserve the characteristics and composition of all relevant strategic views and would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.

1353. The proposal would result in a low level of harm to the grade II* listed Holland House. As such, it would fail to preserve the significance/special interest or setting of this designated heritage asset and conflict with Local

Plan policies, CS12 (1 and 2), DM12.1 (1), Draft City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan CS14, CS 12 (2-5), CS13 and DM12.1 (2-5) DM12.5 Draft City Plan 2040 S11 (1,3-5) S 13, HE1 and London Plan HC 1 (D), HC2, HC3 and HC4. Most germanely, they would preserve the setting and significance of Bevis Marks Synagogue and the special interest, character and appearance of the Creechurch Conservation Area.

1354. Giving considerable importance and weight to the desirability of preserving the significance of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits, set out in more detail in the Heritage section below, include a low level of enhancement to the grade II* Holland House and a low level of enhancement to the Creechurch Conservation Area. The public benefits include the delivery of growth in a highly sustainable location, the opening up of Holland House, and in particular its heritage lobbies, to a much broader demographic, and the provision of a highly compelling mix of educational/ cultural/ community/ sports/ multi-faith spaces across the lower levels of the proposal. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

1355. The proposals comply with the required initial steps of archaeology investigation Local Plan DM 12.4 Draft City Plan 2040 HE2 13, Policies HE1 and London Plan HC1 subject to archaeology conditions.

1356. Through engagement with educational, sporting and arts providers and organisations, charities, multi-faith groups, livery companies and other local key stakeholders, the development would deliver a significant community/cultural offer though the provision of flexible educational/ cultural/ community/ sports/ multi-faith/ amenity space within the lower ground, ground and first floors of the three buildings.

1357. These multi-functional bookable spaces would attract a wide range activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours free of charge. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City

Cluster. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community. The provision of a changing place, public toilet and water fountain, will be secured by condition.

1358. In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (582 long stay and 85 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The three buildings are proposed to be serviced by a single point onto Heneage Lane. 66 daily trips are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.

1359. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. The whole life-cycle carbon emissions per square meter of selected option would be the lowest out of the 4 options tested. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1360. Compared to retrofit options with limited extension potential, the proposed development would result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding further interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. The energy strategy has been optimised for the site and a BREEAM "excellent" rating is targeted, aspiring to an "outstanding" rating through detailed design. Circular economy measures have been incorporated, such as by retaining approximately 35% of the

existing structures, as well as designing for longevity, adaptability and low maintenance. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan policies SI 2, SI 7, Local Plan policies CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

1361. In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant. In terms of thermal comfort beneficial impacts are expected on the existing benches to the north of 30 St Mary Axe.

1362. A number of objections have been received from Bevis Marks Synagogue and members and the wider Sephardi community, inter alia, relating to the impact of the development to the historical and religious significance and the setting of Bevis Marks Synagogue, the loss of daylight and sunlight to the Synagogue, overshadowing of its courtyard and the ability to view the sky and the moon in order to observe religious practices.

1363. As discussed above and in length in the main body of the report, it is considered that the proposed development would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

1364. In terms of the daylight and sunlight impacts into the Synagogue, officers are extremely cognisant of the matters raised by the Jewish community and have analysed these in considerable detail. However, it is considered that the impacts would be limited, localised and minimally noticeable at ground floor level and slightly more noticeable at the southwest area to the mezzanine level. The VSC effects caused by the proposed development are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA

terms. The effects of cumulative scenarios have been assessed including consented and unconsented schemes. Although minor to moderate adverse effects are identified in the cumulative vs existing baseline scenario, the additional effects would be due to other consented schemes. It is also noted that BRE guidelines for daylight distribution and sunlight are again met in the cumulative scenario.

1365. As such, it therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah and the Ark. Consequently, on the basis of the detailed evidence provided, officers come to the view that the visual appreciation of the religious ceremonies and associated activities including the reading of religious text would not be diminished to a significant or perceptible degree. From this it can be concluded that, based on the quantifiable daylight impact results, the effects of the proposal on daylight to the interior of the Synagogue would not be great enough to compromise the religious use or activities therein.

1366. Since the submission of the application, a daylight and sunlight empirical report has been submitted on behalf of the S&P Sephardi community and the Bevis Marks Synagogue Rabbi. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that the although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

1367. At present no area of the courtyard receives two hours of sunlight on 21 March and therefore, although no area would be able to receive sunlight on the 21 March following the erection of the proposed development, the BRE guidelines are met. The Sun Exposure analysis and shadow diagrams, submitted with the application, show a reduction in the average sunlight

availability within the courtyard of 16 minutes to 19 minutes when comparing the proposed development (including the consented schemes) with the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. As a result, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would affect the setting of the listed building or its associated amenities and it would not preclude from continuing to be used for religious events and as part of the visitor experience visiting the Synagogue's exhibition centre.

1368. To respond to the concerns raised regarding the ability to recite the Kiddush Levana prayer, the applicant has submitted a Lunar Transit Study, assessing the impact the development would have on the visibility of the moon in the night sky. This study was independently reviewed. Following discussions with the Synagogue's Rabbi, the visibility of the sky from two observer points at the entrance of the Synagogue courtyard were assessed. Based on the results produced taking into account a full moon cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistice respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistices from both points. When considering the months and days that the moon would be able to be visible, taking into account the development alone (cumulative vs future baseline) it is noted that there would be no further reduction in the months that the moon would be able to be visible (the moon would still be able to be viewed 8 months of the year) and minor reductions in the number of days (50 days instead of 52 or 51 days every year, in case of a major and minor lunistice year respectively). In terms of hours there will be a reductions exceeding 40 hours in each year.

1369. It is therefore concluded that currently there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings. The proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline. Although the impact of the development in terms of relative losses is acknowledged, the prayer would still be able to be recited in those same months each year as the future baseline scenario. Whilst the development

would have some impact on the ability to recite the Kiddush Levana Prayer due to the reduced hours that the moon would be able to be visible, it would not have a material impact on the ability to carry out of other religious practices including circumcision, the observance of Shabbat, and daily obligations. It is the view of officers that such an adverse impact is small, and should, taking account of the duties imposed by section 149 of the Equality Act 2010, therefore be attributed limited weight. In any event such adverse impact would be outweighed by the many public benefits of the scheme as set out in this report.

1370. In terms of daylight impacts on other receptors, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane which would experience moderate adverse effects. However, the absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels.

1371. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1372. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

1373. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

1374. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Cluster and public realm would be complied with that notwithstanding the conflict with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces), draft

City Plan Policies 2040 S11 (Historic Environment), S12 (3) (Tall Buildings), and London Plan HC1 (Heritage Conservation and Growth), the proposals comply with the development plan when considered as a whole.

1375. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing 34,584 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weight in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Securing a strategic high-quality mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster which contributes to the Destination City objectives;
- The provision of generous and unique multi-functional community, cultural, educational, sports, multi-faith, amenity space that is intended to reach out to the wider community and provide a gateway into the City to access opportunities to inspire, connect, create and educate themselves and deliver genuine public benefits to the wider community;
- Provision of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities that meets the City's vision to providing inclusive workspace;
- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function and growing number of working population and number of visitors, whilst enhancing a place which would be more interesting and vibrant with active street frontages;
- Provision of a rooftop urban farm and climbing wall offering a nurturing environment for learners to explore and encouraging health and wellbeing by new sport and recreational facilities;
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. It would result in modest

enhancement to the exteriors of Holland House. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.

- Provision of meaningful public art along Heneage Arcade and to educate public about heritage.

1376. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

1377. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1378. As discussed above, the paragraph 208 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less that substantial harm.

1379. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

- Air Quality Positive Statement (Hoare Lea, 2 November 2023)
- Carbon Options Tool
- CIL Form (Welput, 4 January 2024)
- Circular Economy Statement Rev.4 (Hoare Lea, 22 December 2023)
- Climate Change Resilience Sustainability Statement Rev.4 (Hoare Lea, 21 August 2024)
- Construction Environmental Management Plan Rev.5 (Hoare Lea, January 2024)
- Contamination Report (Landmark, 31 March 2023)
- Cover letter (DP9, 4 January 2024)
- Cultural Strategy (J2, January 2024)
- Daylight, Sunlight & Overshadowing – Radiance Based Supplementary Report (GIA, January 2024)
- Development DSO analysis compared against the Refused Development analysis (GIA, October 2024)
- Delivery and Servicing Plan (Steer, January 2024)
- Design and Access Statement (Stiff and Trevillion, January 2024)
- Energy Statement Rev.4 (Hoare Lee, 10 October 2023)
- Environmental Statement Non-Technical Summary (Trium, January 2024)

Environmental Statement (Trium, January 2024):

1. Volume 1: ES Main Report
    i. Chapter 1 Introduction
    ii. Chapter 2 EIA Methodology
    iii. Chapter 3 Alternatives and design evolution
    iv. Chapter 4 The Proposed Development
    v. Chapter 5 Demolition and Construction
    vi. Chapter 6 Socio-Economics
    vii. Chapter 7 Traffic and Transport
    viii. Chapter 8 Air Quality
    ix. Chapter 9 Noise and Vibration
    x. Chapter 10 Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage
    xi. Chapter 11 Wind Microclimate
    xii. Chapter 12 Archaeology
    xiii. Chapter 13 Climate Change
    xiv. Chapter 14 Effect Interactions
    xv. Chapter 15 Likely Significant Effects and Conclusions
    xvi. Chapter 16 Mitigation and Monitoring Schedule
2. Volume 2: Heritage, Townscape and Visual Impact Assessment
3. Volume 3: Technical Appendices
    - Appendix: Introduction

i. Annex 1: Location of Information within the ES ('wayfinding' document)
ii. Annex 2: EIA Statement of Competent Experts
iii. Annex 3: Glossary

- Appendix: EIA Methodology

iv. Annex 1: Informal EIA Scoping Report
v. Annex 2: EIA Waste Note
vi. Annex 3: Correspondence from CoL on EIA Scoping
vii. Annex 4: Cumulative Schemes List and Map
viii. Annex 5: Climate Change Technical Note

- Appendix: Air Quality

ix. Annex 1: Legislation, Policy and Guidance Documents
x. Annex 2: Construction Dust Mitigation Measures
xi. Annex 3: Construction Road Traffic Modelling Methodology
xii. Annex 4: Construction Road Traffic Modelling Results
xiii. Annex 5: Professional Experience

- Appendix: Noise and Vibration

xiv. Annex 1: Glossary
xv. Annex 2: Legislative, Policy and Guidance Documents
xvi. Annex 3: Noise Survey Data
xvii. Annex 4: Road Traffic Data Sets

- Appendix: Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage

xviii. Annex 1: Relevant Planning Policy and Guidance
xix. Annex 2: Methodology and Baseline
xx. Annex 3: Drawings
xxi. Annex 4: Daylight and Sunlight Results
xxii. Annex 5: No Sky-Line Contour Drawings
xxiii. Annex 6: Window Maps
xxiv. Annex 7: Overshadowing Assessment
xxv. Annex 8: Solar Glare Results
xxvi. Annex 9: Light Spillage Results

- Appendix: Wind Microclimate

xxvii. Annex 1: Policy and Guidance
xxviii. Annex 2: Technical Appendix – Wind Tunnel
xxix. Annex 3: Technical Appendix -- CFD

- Appendix: Archaeology

xxx. Annex 1: Planning Policy and Legislation
xxxi. Annex 2: Archaeological Desk-Based Assessment

- Appendix: Climate Change and Greenhouse Gases

xxxii. Annex 1: Policy and Guidance Background
xxxiii. Annex 2: Extract from Whole Life Carbon Assessment
xxxiv. Annex 3: Extract from Energy Strategy

- Appendix: Ecology

xxxv. Annex 1: Preliminary Ecological Appraisal and Biodiversity Net Gain Report

- Appendix: Geo-Environmental

xxxvi. Annex 1: Geo-Environmental and Geotechnical Phase 1 Desk Study

- Environmental Impact Assessment Cumulative Schemes Review (Trium, 25 September 2024)
- Equalities Statement (Quod, January 2024)
- Equality Statement Independent Review (Buro Happold, 15 November 2024)
- Fire Strategy Rev.03 (Semper, 19 September 2023)
- Flood Risk and Drainage Strategy Rev.P2 (Thornton Tomasetti, 20 September 2023)
- Framework Travel Plan (Steer, January 2024)
- GLA Carbon Emissions Spreadsheet
- GLA Circular Economy Spreadsheet
- GLA Energy Strategy Spreadsheet
- Health Impact Assessment (Quod, January 2024)
- Heritage Statement Holland House (KM Heritage, December 2023)
- Heritage, Townscape and Visual Impact Assessment (The Townscape Consultancy, 25 January 2024)
- Landscape Statement (Bowles & Wyer, January 2024)
- Lighting Strategy (Hoare Lea, January 2024)
- Outdoor Thermal Comfort Assessment (GIA, 12 October 2023)
- Planning Statement (DP9, January 2023)
- Review of lunar transit study (BRE, 4 November 2024)
- Review of daylight, sunlight, overshadowing, solar glare and light spillage assessment (BRE 16 August 2024)
- City of London
- Statement of community involvement (Kanda, January 2024)
- Statement of community involvement Addendum (Kanda, September 2024)
- Structural Report and Basement Impact Assessment (Thornton Tomasetti, 29 September 2023)
- Sustainability Statement (Hoare Lea, 10 October 2023)
- Third Party Review: Carbon Optioneering Study (Arup, 7 February 2024)
- Tower of London Heritage Impact Assessment (The Townscape Consultancy, December 2023)
- Transport Assessment (Steer, January 2024)
- Utilities Statement Rev.2 (Hoare Lea, 27 July 2023)
- Ventilation/Extraction Statement Rev.4 (Hoare Lea, 18 September 2023)
- Whole Life Carbon Assessment Rev.3 (Hoare Lea, 10 October 2023)
- Whole Life Carbon Assessment Spreadsheet

Representations - Members of the Public

15-Mar-24, Harris, Geraldine
15-Mar-24, Kovalskyi, Volodymyr
15-Mar-24, Shollar, Leah-Perl
15-Mar-24, Fox, Nicola

15-Mar-24, Marrache, Jacob
15-Mar-24, Martin Wright, Julia
15-Mar-24, Shelper, Jonathan
15-Mar-24, GURNEY, DAVID
16-Mar-24, Skellon, Katherine
16-Mar-24, Hughes, Tricia
16-Mar-24, Lawson, Robert
16-Mar-24, Odebi, Idris
16-Mar-24, Crew, Steve
16-Mar-24, Arenas Martinez, Ivan
18-Mar-24, W, A
18-Mar-24, Brady, R
19-Mar-24, Varsamis, Dimitri
19-Mar-24, Beloff, Jonathan
19-Mar-24, Garson, Raphael
19-Mar-24, Bonnet, Joel
19-Mar-24, Kimhi, Emmeli
19-Mar-24, Millunchick, Samuel
19-Mar-24, Knott, Wendy
19-Mar-24, Reginald, S
19-Mar-24, Toff, Penelope
19-Mar-24, Green, Michael
19-Mar-24, Orenstein, Joe
19-Mar-24, Ledman, Rebecca
19-Mar-24, Cabrera, Carlos
19-Mar-24, O'Connell, Theresa
19-Mar-24, Van den Bergh, Martin
19-Mar-24, Kendall, Rebecca
19-Mar-24, Altneu, Emily
19-Mar-24, Barnett, Ian
19-Mar-24, Souroujon, Stephanie
19-Mar-24, Stone, Lee
19-Mar-24, Pitts, Jonathan
20-Mar-24, Forbes, Karen
20-Mar-24, Querfurth, Keren
20-Mar-24, Waterman, Dov
20-Mar-24, Lebon, Scott
22-Mar-24, de Vries, Arnold
22-Mar-24, Ehrenzweig, M
22-Mar-24, Silver, Lorraine
25-Mar-24, Stolerman, Professor Ian
25-Mar-24, Nyman, Susan
25-Mar-24, Kramer, Miriam
25-Mar-24, Leon, Jean

25-Mar-24, Ross, Xander
25-Mar-24, WATERMAN, Stanley
26-Mar-24, Seres, David
26-Mar-24, Levene, Peter
26-Mar-24, Montagu, Sarah
26-Mar-24, Bower, Patrick
27-Mar-24, Somekh, Jonathan
27-Mar-24, Graziani, Lia
27-Mar-24, Holland, Sasha
27-Mar-24, Sorani, Ornella
27-Mar-24, Levy, Oliver
27-Mar-24, Lebrecht, Elspeth
27-Mar-24, Setton, Malcolm
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27-Mar-24, SUEKE, JOHN
27-Mar-24, Cohen, David
27-Mar-24, Gomes da Costa, Marcus
27-Mar-24, RIESE, GINA
27-Mar-24, Raquel de Almeida, Maria
27-Mar-24, Krygier, Emma
27-Mar-24, Mizrahi, Paulette
27-Mar-24, Levy, Gemma
27-Mar-24, Green, Charlotte
27-Mar-24, Leon, Roger
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27-Mar-24, gubbay, lucien
27-Mar-24, Zelouf, Diana
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27-Mar-24, Dawood, Cindy
27-Mar-24, Marshall, Vivien
27-Mar-24, salem, phili
27-Mar-24, Webber, Michael
27-Mar-24, Fellerman, Naomi
27-Mar-24, Adler, Fiona
27-Mar-24, Salem, Freddy
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27-Mar-24, Simon, Ann
27-Mar-24, Dwek, Marie-Anne
27-Mar-24, Davidson, David
27-Mar-24, Arwas, Jenny
27-Mar-24, Bekhor, Jack
27-Mar-24, Zinkin, Peter
27-Mar-24, Jacobs, Steven
27-Mar-24, Yentob, Robert
27-Mar-24, Baroness Deech, Ruth
28-Mar-24, Baroukh, Vivien
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28-Mar-24, Donoghue, Denise
28-Mar-24, shamash, david
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28-Mar-24, Caddy, Adam
28-Mar-24, Benzecry, Kitty
28-Mar-24, Alliance, Homa
28-Mar-24, Morgan, Cyril
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28-Mar-24, Moses, Selina
29-Mar-24, Ish-Horowicz MBE, Judith
29-Mar-24, ORENSTEIN, Sara
29-Mar-24, Salem, Muriel
29-Mar-24, Khalastchi, Tony
29-Mar-24, Martin, Gusti
29-Mar-24, Mocatta, Edward Charles
29-Mar-24, Ansell Brauner, G. E.
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29-Mar-24, Sopher, Rachel
29-Mar-24, Gold, A
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30-Mar-24, Timan, Ezra

30-Mar-24, Timan, Ruth
30-Mar-24, Gubbay, Joshua
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01-Apr-24, BAYLIN, RONALD
01-Apr-24, KRAMER, STEPHEN
01-Apr-24, Seres, Jennye
01-Apr-24, Cohen, Charles
01-Apr-24, Montefiore, Victor
02-Apr-24, Sandler, Patricia
02-Apr-24, OBERMAN, ISABEL
02-Apr-24, Morgenthau, Allan
02-Apr-24, Morris, Sarah-Lou
02-Apr-24, Jackson Levy, Caroline
02-Apr-24, Epstein, Thelma
02-Apr-24, Banks, Adrienne
02-Apr-24, Kemp, Malcolm
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02-Apr-24, Burton, Charles
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03-Apr-24, Samson, Alan
03-Apr-24, Mount, Amanda
03-Apr-24, Solomons, Lesley
03-Apr-24, Taylor, Nick
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03-Apr-24, Sanders, Anna
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07-Apr-24, Ezra, Nicola
07-Apr-24, Assor, Marc
07-Apr-24, Jacob, Deni
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07-Apr-24, Cowan, Natasha
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10-Apr-24, Braham, Syd
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10-Apr-24, Fineberg, Mark
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12-Apr-24, Charles, Michelle
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12-Apr-24, Brett, Richard
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16-Apr-24, Simons, Josephine
16-Apr-24, dhaliwal, Mandeep
16-Apr-24, Pemberton, Nichola
16-Apr-24, Albert, Brian
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16-Apr-24, Benjamin, Janice
16-Apr-24, de Sola Mendes, Eliza
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16-Apr-24, Geismar, Robert
16-Apr-24, roth, brian
16-Apr-24, Kreindler, Simon
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16-Apr-24, Kandel, Susan
16-Apr-24, Jackson, Daniel
16-Apr-24, Haynes, Michelle
16-Apr-24, Getto, Melanie
16-Apr-24, Montagu, Isaac
16-Apr-24, Berk, Louis
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16-Apr-24, Mizrahi, Paulette
16-Apr-24, Poll, Michael
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16-Apr-24, Sherwood MBE, Peggy
16-Apr-24, Zubaida, David
16-Apr-24, Porter, Deborah
16-Apr-24, Levene, Wendy
17-Apr-24, Walker, Anne
17-Apr-24, Phillips, gary
17-Apr-24, Goldberg, Mira
17-Apr-24, Oakley, Melanie
17-Apr-24, Halban, Peter
17-Apr-24, Berger, Doreen
17-Apr-24, ALPERT, MICHAEL
17-Apr-24, Shaw, Carole
17-Apr-24, Har-Zion, Shay
17-Apr-24, Urazovskaya, Liana
17-Apr-24, Costa, E
17-Apr-24, Steinberg, Jonathan

17-Apr-24, Jarolimkova, Vita
17-Apr-24, bright, georgina
17-Apr-24, Brower, Danny
17-Apr-24, Levi, Ron
17-Apr-24, Rubens, Angela
17-Apr-24, Perdomo, Pedro
17-Apr-24, Crollick, Avril
17-Apr-24, Ghnassia, Oliver
18-Apr-24, Sanford, Clive
18-Apr-24, singer, laurence
18-Apr-24, Abell, Grace
18-Apr-24, Jackson, Judith
18-Apr-24, Jackson, Michael
19-Apr-24, Finkel, Mazaltob Ruth
19-Apr-24, Sneader, Alex
19-Apr-24, Richards, David
19-Apr-24, Skinazi, Karen E.
19-Apr-24, Green, Abigail
19-Apr-24, Bennett, Michael
19-Apr-24, Copitch, Cyril
19-Apr-24, Richards, Mark
19-Apr-24, Blume, Dame Hilary
19-Apr-24, LEVY, JOHN
19-Apr-24, Eshel, Rosemary
19-Apr-24, King, Albert
19-Apr-24, Joory, Joy
19-Apr-24, TREUHERZ i, Francis
19-Apr-24, Gold, Jeffrey and Bonita
19-Apr-24, Brooks Evans, Michelle
19-Apr-24, Gomes da Costa, Diana
20-Apr-24, Page, Anne
20-Apr-24, Carver, Shirlee
21-Apr-24, Smilg, Jeremy
21-Apr-24, Stein, Janis
21-Apr-24, Stewart, Rosalind
21-Apr-24, Coelho, Jane
21-Apr-24, Franks, Joanna
21-Apr-24, Ronish, Yarema
22-Apr-24, Franks, Joanna
22-Apr-24, Grubin, Donald
22-Apr-24, Pilo, Jacquelynne
22-Apr-24, Black, Pat
22-Apr-24, GARCIA, Nicola
22-Apr-24, Courtney, Yvonne

23-Apr-24, Sale, Anabel Unity
23-Apr-24, Harris, John
23-Apr-24, Burstin, Stephen
23-Apr-24, Othen, Gillian M
23-Apr-24, Rees, Alison
23-Apr-24, Coleman, Brian
23-Apr-24, Carson, Steven
23-Apr-24, Denham, J
24-Apr-24, Jeffrey, Robin
24-Apr-24, jackson, claire
24-Apr-24, Mann, Alan
24-Apr-24, Baharier, Linda
24-Apr-24, Topper, Amelia
24-Apr-24, Schonfield, Amos
24-Apr-24, Burstin, Stephen
24-Apr-24, Solomons, Jonathan
24-Apr-24, Shupak, Harold
24-Apr-24, Dobson, Owen
24-Apr-24, Fox, Vicki
24-Apr-24, Moreland, Lee S
24-Apr-24, Simon, Barbara
24-Apr-24, Ward, Kevin
24-Apr-24, Hommel, Jeantique
24-Apr-24, Comaroff, John
24-Apr-24, Rubens, Fiona
24-Apr-24, Rubin, Miri
24-Apr-24, Schmool, Marlena
24-Apr-24, Inglesant, Philip
24-Apr-24, PNatali,
24-Apr-24, Gulland, Yvette
24-Apr-24, Simmons, David
24-Apr-24, Matthews, Stephen
24-Apr-24, Walden, Kiri
24-Apr-24, Sawyer, Jenny
25-Apr-24, Levine, Stuart
25-Apr-24, de Pass, Jonathan
25-Apr-24, Sneader, Graham
25-Apr-24, Lawrence, NIgel
26-Apr-24, Baskin, Usevalad
26-Apr-24, Morganstein, Stuart
26-Apr-24, Gauthier, Charlotte
26-Apr-24, Ward, James
26-Apr-24, Sondack, Julia
26-Apr-24, Naar, John

26-Apr-24, Schonfield, Jeremy
26-Apr-24, Ridler, Katharine
26-Apr-24, Dingle, Barbara
26-Apr-24, Amado, Jozef Ercevik
26-Apr-24, Waller, Suzanne
26-Apr-24, Lewis, Rebecca
26-Apr-24, Bernstein, Antony
27-Apr-24, Kindelan, Adam
28-Apr-24, Richards, Paul
28-Apr-24, Richards, Guy
28-Apr-24, Shamash, Sue
28-Apr-24, Petretti, Richard
29-Apr-24, Stock, Lisanne
29-Apr-24, Langner, Lola
29-Apr-24, Eskenzi, Yvonne
29-Apr-24, Gritzman, Jeffrey
29-Apr-24, Dreyfuss, John
29-Apr-24, Edwards, Matthew
29-Apr-24, Vock, Ido
29-Apr-24, Flaxington, Frances & Lee
29-Apr-24, Lawrence, Beverley
29-Apr-24, Gayer, Stephen
29-Apr-24, Hart, Ruth
29-Apr-24, Owen, Denise
29-Apr-24, Kalinowska, Jo
29-Apr-24, Nowill, Rob
29-Apr-24, Darley, Gillian
29-Apr-24, Symonds, V
29-Apr-24, Verbick, Jade
29-Apr-24, Craig Cohen, Leonora
30-Apr-24, Roumani, Judith
30-Apr-24, Lampert, Dorothy
30-Apr-24, Kateb, Fuad
30-Apr-24, Bloom, Alastair
30-Apr-24, sitch, peter
30-Apr-24, Tamman, Jessica
30-Apr-24, Shaw, David
30-Apr-24, Fyne BA FRSA Solicitor (Non Practising), Daniel
01-May-24, Brett, Edward
01-May-24, Mainz, Andrew
01-May-24, Tarlton, Calvin
01-May-24, Farrell, Tommy
01-May-24, Dean, Gemma
01-May-24, Feldman, Alex

01-May-24, Cory, Graham
01-May-24, Gorman, Suzanne
01-May-24, Baccus, Aslam
01-May-24, Hillman, Michael
01-May-24, Sames, Dan
01-May-24, Sapphire Employability,
01-May-24, Castle, Lauren
01-May-24, Webster, Oliver
01-May-24, Webster, Oliver
01-May-24, Chadwick, Nicola
01-May-24, Parsons, Kathleen
01-May-24, Scott, Adam
01-May-24, Morley, Phillip
01-May-24, Franco, Mario
01-May-24, Jackson, Alexandra
01-May-24, Robinson, Tommy
01-May-24, Jackson, Paul
01-May-24, Shaw, David
01-May-24, Rabinowitz, Monica
01-May-24, Denham, Alison
02-May-24, oleary, Lorraine
02-May-24, Chissick, Michael
02-May-24, Midda MBE, Loraine
02-May-24, Hollick, Jeanette
02-May-24, Goldstein, Andrew
02-May-24, Samsworth, Jane
02-May-24, Stock, Caroline
02-May-24, Heitlinger, Philip
02-May-24, Hammond, Joan
02-May-24, Crowne, Tilla
02-May-24, Krol, Alan
02-May-24, Grossman, Deena
02-May-24, Graham, David
02-May-24, Clarkson, Paul
02-May-24, Firth, Tanya
02-May-24, Braithwaite, Nick
02-May-24, Wertheim, David
02-May-24, Dorey, Helen
02-May-24, homewood, alison
02-May-24, Webb, Julia
02-May-24, Banatvala, Fiona
02-May-24, Hepher, Roger
02-May-24, Horowitz, Michael
02-May-24, Wakeman, Lindsay

02-May-24, Dunkley, Sam
02-May-24, Montlake, Martha-Anne
02-May-24, Glaessner, Verina
02-May-24, Julius, Corinne
02-May-24, Glaessner, Verina
02-May-24, Hunt, R. G.
02-May-24, Scott, Paul
02-May-24, Penny, Susan
02-May-24, Cannell, Dave
02-May-24, Morris, Shelagh
02-May-24, Venner, Peter
02-May-24, Ramsay, Steve
02-May-24, Kustow, R Alexandra
02-May-24, Lilley, Rebecca
02-May-24, Plummeridge, Joy
02-May-24, Hibbert, Neil
02-May-24, Miller, Jonathon
02-May-24, Howe, Andrew
02-May-24, Ellis, Peter
03-May-24, Salter, Amy
03-May-24, Beard, David
03-May-24, Corrin, Christopher
03-May-24, Hardisty, Michael
03-May-24, Pike, Graham
03-May-24, Bilbul, Jonathan
03-May-24, Shintag, Rachelle
03-May-24, Gubbay, Judith
03-May-24, Schluter, Angela
03-May-24, Owens, M
03-May-24, Thompson, Alan
03-May-24, Baskerville, Patricia
03-May-24, ISRAEL, ANTHONY
03-May-24, Tyson, Diana
03-May-24, Garnham, Lucy
03-May-24, Stallwood, W
03-May-24, Saunders, Joanne
03-May-24, Mocatta, Michael
03-May-24, Balkin, Brian
04-May-24, Amar, Janine
04-May-24, Liverseidge, Janice
04-May-24, Lawrence, P
04-May-24, Childerstone, Meredith
04-May-24, Moses, Selina
04-May-24, Rothschild, Louise

04-May-24, Kal-Weiss, Holly
04-May-24, Carp, Debbie
04-May-24, Walker, Caroline
04-May-24, Goldman, Jeffrey
04-May-24, Beenstock, Sian
05-May-24, Whaley, karen
05-May-24, Caller, Niki
05-May-24, Tolley, Tamara
05-May-24, Silverstone, Fay
05-May-24, Gilbert, Dina
05-May-24, Kuhn, Michael
05-May-24, Symons, Geraldine
05-May-24, Gafsen, Susan
05-May-24, Goodman, Judi
05-May-24, Stone, Lee
05-May-24, Newman-Crane, Sue
05-May-24, Sinclair-Horne, Annabel
05-May-24, Rahamim, Simon
05-May-24, LEHMANN, Laura
05-May-24, Bekhor, Alan
05-May-24, Pick Crystal, Suzana
05-May-24, Daniel, Edward
05-May-24, Harris, Joy
05-May-24, Rose, Helena
05-May-24, Angus, Bernard and Ruth
05-May-24, Stagni, Silvano
05-May-24, Brice, Katherine
05-May-24, Son, Michael
05-May-24, Hilsenrath, Alex
06-May-24, Baharier, Michelle
06-May-24, Levy, Raymond
06-May-24, Levy, Raymond
06-May-24, Ereira, Angela
06-May-24, Leigh-Wood, Oliver
06-May-24, Shapiro, Adam
06-May-24, Martin, Frank
06-May-24, Richardson, Joanna
06-May-24, Billinghurst, Keith
06-May-24, Evans, Chris
06-May-24, Gower, Judith
06-May-24, Steinberg, Susan
06-May-24, Kessler, Charles
06-May-24, Hepher, Margaret
06-May-24, Shear, Hugh

06-May-24, Edwards, Jennifer
06-May-24, MacNeil, Chris
06-May-24, Kindelan, Adam
06-May-24, Silver, Rachelle
07-May-24, Scott, Marion
07-May-24, Hudson, Lee D
07-May-24, Riella, Samantha
07-May-24, Riella, Samantha
07-May-24, Furness, Sara
07-May-24, McGurran, Deborah
07-May-24, Walker, Marcus
07-May-24, Simpson, Karla
07-May-24, Eisner, Philippe
07-May-24, Waterman, Dawn
07-May-24, Montgomery, Ruth
07-May-24, Hogan, Margaret
07-May-24, Isaacs, L
07-May-24, Johnson, Donna
07-May-24, Bankover, Michael
07-May-24, Roston, Natasha
07-May-24, Sacks, Rachel
07-May-24, Renton, D
07-May-24, Segall, Edwin
07-May-24, Wright, carin
07-May-24, Hakkak, Meir
08-May-24, Smith, Lynda
08-May-24, Stein, S
08-May-24, Davey, Cathy
08-May-24, SMITH, Maurice
08-May-24, Silverstein, Raymond
08-May-24, Sassoon, Janette
08-May-24, Ronish, Yarema
08-May-24, Morris, Howard
08-May-24, Cusack, Andrew
08-May-24, Acres, Tom
08-May-24, Album, Edward
08-May-24, Ben Garcia, Jonathan
08-May-24, Torry, The Rev'd Dr Malcolm
08-May-24, Jacobs, Everett M
08-May-24, Sondes, The Countess
08-May-24, Coghill, Andrew
08-May-24, Azagury, A E
08-May-24, LL, A
08-May-24, Jones, Roslyn

08-May-24, Bijl - Meijer, Anna
09-May-24, Austen, Michal
09-May-24, Faulds, Susan
09-May-24, palache, ralph
09-May-24, Nicholas, Ronny
09-May-24, Lecutier, Louise
09-May-24, Sorotzkin, Duche
09-May-24, Gau, Justin
09-May-24, Hardy, Patrick
09-May-24, Brooks, Iolo
09-May-24, Harrison, Sarah
09-May-24, Marks, Jackie
09-May-24, Bye, Georgina
09-May-24, Stapleton, Mariella
09-May-24, Stapleton, Laura
09-May-24, Devine, Kathryn
09-May-24, Purcell, Mark
09-May-24, LAX, JACOB
09-May-24, Binke, Adrian
09-May-24, Artoon, Sydney
09-May-24, Jacobs, Tony
09-May-24, Joseph, Natalie
09-May-24, Franz, Benjamin
09-May-24, Morales, Eva
09-May-24, Collins, Lauren
09-May-24, Kaiser-Chen, Aaron
09-May-24, Summers, Dominic
09-May-24, Ani, Alex
09-May-24, Shenton, Caroline
09-May-24, Doherty, Helen
09-May-24, de Solla, Wendy
09-May-24, Ansell, Charlotte
09-May-24, Mocatta, David
09-May-24, Terpilowski, Sue
09-May-24, Ruff, Chris
09-May-24, black, keith
09-May-24, Nathan, Gia
09-May-24, Hassan, Alexandra
09-May-24, Greenberg, Susan
09-May-24, Max, Jonathan
09-May-24, Fawcett, Robin
09-May-24, Marsh, Alan
09-May-24, Lawrence, Harvey
09-May-24, Scott, Lisa

09-May-24, Davila, Patricia
09-May-24, Rose, Adam
09-May-24, Simon, Rashi
09-May-24, Lent, Paula
09-May-24, Vos, Benjamin
09-May-24, Fraser, Lola
09-May-24, Leffman, ADELE
09-May-24, Samuel, Jonathan
09-May-24, SOLOWAY, stuart
09-May-24, Pell Scholes, Daisy
09-May-24, Duke, Marc
09-May-24, Bendahan, Yael
09-May-24, Pell Scholes, Barney
09-May-24, Abboudi, Maurice
09-May-24, Wiesenberg, Mindy
10-May-24, Lee, Marilyn
10-May-24, Winston, Anthony
10-May-24, Hasenson, Phillippa
10-May-24, Williamson, Donald
10-May-24, Weiss, Annie
10-May-24, Brown, Jeremy
10-May-24, Lerner, David
10-May-24, Dwek, David
10-May-24, Marks, Michael
10-May-24, Wilson, Mark
10-May-24, Loftus, Richard
10-May-24, Ta, David
10-May-24, Holt, Jason
10-May-24, Lester, Jonathan
10-May-24, Stubbs, Ian
10-May-24, Loftus, Nicola
10-May-24, stephenson, judy
10-May-24, Mellman, Susan
10-May-24, Lerner, Ashley
10-May-24, Ognall, Geoffrey
10-May-24, Nono, Paola
10-May-24, Graff, Michelle
10-May-24, Shaanan-Eisen, Naomi
10-May-24, Freedman, James
10-May-24, LEVY, DANIEL
10-May-24, Wober, Jonathan
10-May-24, Lerner, Marc
10-May-24, Davis, Angela
10-May-24, Pereira-Mendoza, Marc

10-May-24, Swart, Ben
10-May-24, Cotte, Severine
10-May-24, Stamler, Darcy
10-May-24, Steinman, Sharon
10-May-24, Morrison, John
10-May-24, Prever, Danny
10-May-24, Owen, Matthew
10-May-24, Bridge, Mark
10-May-24, Steven, Elizabeth
10-May-24, Hassan, Isaac Samuel
10-May-24, Shakhani, Ronit
10-May-24, Elias, Aviva
10-May-24, Rich, Miriam
10-May-24, Curry, Nicholas
10-May-24, Stern, Adrian
10-May-24, Green, Edwin
10-May-24, Kay, Michelle
10-May-24, Cummins, Mark
10-May-24, Canfield, Teresa
10-May-24, Welsh, Stephen
10-May-24, Bridge, Jenepher
10-May-24, Braham, Samuel
10-May-24, Cummins, Mark
10-May-24, Smith, Fiona
10-May-24, Martins Dos Santos, Jonatan Ismael
10-May-24, Bollins, Patricia
10-May-24, Gurevitz, Shirley
10-May-24, Gregor, Neil
10-May-24, Zenios, Jonathan
10-May-24, musgrove, theresa
10-May-24, Pitcher, John
10-May-24, Blackman, Bob
10-May-24, Edwards, Kerry
10-May-24, Todd, Edward
10-May-24, Cohen, JK
10-May-24, Charig, Nigel
10-May-24, Parker, Marsha
10-May-24, Dalton, Karen
10-May-24, Chambers, Mark
10-May-24, Field, Frances
10-May-24, Rackovsky, Ariel
10-May-24, Flory, Oliver
11-May-24, Berno, G
11-May-24, Daniels, Jon

11-May-24, de Jong, Benjamin
11-May-24, Bailey, Jane
11-May-24, Short, Geoff
11-May-24, Graham, Jody
11-May-24, Webster, Martin
11-May-24, Jessop, Manuella
11-May-24, Roberts, Daniel
11-May-24, Kirk, Helen
11-May-24, Olesker, David
11-May-24, Weiner, Julia
12-May-24, Stone, Marion
12-May-24, Firestone, Noreen
12-May-24, Hawk, White
12-May-24, Newman, Jeremy
12-May-24, Cramer BEM, Dalia
12-May-24, Silver, Justin
12-May-24, Lewinsohn, Ronald
12-May-24, Phillips, Adrienne
12-May-24, Musson, Jeremy
12-May-24, Joseph, Michael
12-May-24, Tilley, Joe
12-May-24, Sogbodjor, Harriet
12-May-24, Treatman, Aharona
12-May-24, Ambrose, Jonathan
12-May-24, Maynard, Esther
12-May-24, Ambrose, Jonathan
12-May-24, Roberts, Maralyn
12-May-24, Lovat, Laurence
12-May-24, Boonin, Dov
12-May-24, Wimborne, Zoe
12-May-24, Altman, Colin
12-May-24, Wurtzel, David
12-May-24, Howe, Anthony
12-May-24, Stone, Jeremy
12-May-24, Mcclements, Neil
12-May-24, Gold, Jonathan
12-May-24, Gottschalk, Sylvia
13-May-24, Rodrigues Balbuena, Monique
13-May-24, Jebreel, Elliot
13-May-24, Roberts, Guy
13-May-24, Sayliss, Adrian C
13-May-24, Gibbons, Stuart
13-May-24, Dreyfuss, John
13-May-24, Isaacs, Tina

13-May-24, Eskenzi, Eileen
13-May-24, Haagman, Francine
13-May-24, Blake, Michael
13-May-24, Milne-Day, Mary
13-May-24, Preston, Jane
13-May-24, Newman, Martin
13-May-24, Simon, Michael
13-May-24, Amado, Can
13-May-24, Mann, John
13-May-24, Filer, Paul
13-May-24, BenTzvi, B
13-May-24, Rafaeli, Barbara
13-May-24, Dunbar, William
13-May-24, Teeger, Edward
13-May-24, Agustin, Laura
13-May-24, Lazarus, John
13-May-24, Drain, John
13-May-24, Crowne, Ben
13-May-24, Lipton, Zachary
13-May-24, Castle, Lauren
13-May-24, hajioff, michele
13-May-24, Wiazel, Michal
13-May-24, Benjamin, Jon
13-May-24, Pereira-Mendoza, L
13-May-24, Knight, Marie-Anne
13-May-24, Englender, Daniel
13-May-24, Bogod, Howard
13-May-24, Robinson, Brian
13-May-24, Hale, Alastair
13-May-24, Barker, Neil
13-May-24, Nacamuli, Alec
13-May-24, Goldschmidt, Robert
13-May-24, Black, Michael
13-May-24, Hughes, Stephen
13-May-24, Jacobson, David
13-May-24, Furnell, Alison
13-May-24, Herskovits, Georgie
13-May-24, Davila y Verdin, Juan
13-May-24, Maleh, Maurice
13-May-24, Davis, Rina
13-May-24, silverbeck-setti, sima
13-May-24, Livingstone, Elly
13-May-24, Glickman, Lucy
13-May-24, helfgott, maurice

13-May-24, Glantz, Nikki
13-May-24, Preter, Daniel
13-May-24, El Baz, Freya
13-May-24, Simmons, Dame Melinda
13-May-24, Bloom, Hannah
13-May-24, Glantz, Jacob
13-May-24, Shock, Katherine
13-May-24, Proner, Barry
13-May-24, BERNSTEIN, Shira
13-May-24, Molvidsson, Kay
13-May-24, El baz, Shu
13-May-24, Sixou, Linda
13-May-24, Benhamou, Tristan
13-May-24, Weiner, Howie
13-May-24, Robinson, Jessica
13-May-24, Wrightman, L
13-May-24, Roberts, James
13-May-24, Lopez-Salzedo, Shelley
13-May-24, Yardley, Tracey
13-May-24, Kuttner, Stuart
13-May-24, Mortiaux, Vanessa
13-May-24, Korczyn, Iris
13-May-24, Mana-Stein, Galit
13-May-24, Fishman, Rebecca
13-May-24, Howard, Laura
13-May-24, Fishman, Oliver
13-May-24, Ledermann, Dan
13-May-24, Krigman, Eliza
13-May-24, Szotten, Ruth
13-May-24, Hall, Sasha
13-May-24, Andreacchi, Gracy
13-May-24, Sgnaolin, Yoav
13-May-24, Abramowitz, David
13-May-24, Cohen, Eran
13-May-24, Tanaman, Ruth
13-May-24, Preter, Elizabeth
13-May-24, Zweig, Michal
13-May-24, Lanceman, Stuart
13-May-24, Lanceman, Stuart
13-May-24, Katz, Sara
13-May-24, Smouha, Lucy
13-May-24, Benson, Stella
13-May-24, Howard, Angela
13-May-24, May, Kathryn

13-May-24, Schonfield, Tamar
13-May-24, Cohen, Sarah
13-May-24, May, Spencer
13-May-24, Barnett, Celia
13-May-24, Joffe, Debbie
13-May-24, Rose, Kalina
13-May-24, Speyer, Lawrence
13-May-24, Wacks, Jude
14-May-24, Green, Miriam
14-May-24, Ruback, Greg
14-May-24, Reynolds, Marie
14-May-24, Appel, Cheryl
14-May-24, Strum, Daniel
14-May-24, Bloomfield, Louise
14-May-24, Seplowitz, Harry
14-May-24, Katz, Joanna
14-May-24, Appleson, Karen
14-May-24, Pearson, Taryn
14-May-24, Carr, Kim
14-May-24, Lobel, Vered
14-May-24, Msika, Emmanuelle
14-May-24, Ellis, Linda
14-May-24, Kaye, Lesley
14-May-24, Levene, Sara
14-May-24, Cohen, Ellen
14-May-24, Sacks, Deborah
14-May-24, Tanaman, Baruch
14-May-24, Brown, Joshua
14-May-24, Hougie, Jacob
14-May-24, Kliman, Sonia
14-May-24, Wolfe, Laura
14-May-24, Stone, Judith
14-May-24, Barnett, Robert
14-May-24, Hilton, Michael
14-May-24, Aslet, William
14-May-24, Swaythling, Alistair
14-May-24, Hyman, Neil
14-May-24, Gold, Jessica
14-May-24, Obadia, Anne
14-May-24, Levi, Albert
14-May-24, Scott- Norman, Anthony
14-May-24, Miller, Abigail
14-May-24, Walden, Sam
14-May-24, Bowers, Liz

14-May-24, Evans, Judy
14-May-24, Green, Renee
14-May-24, Zender, Mrs
14-May-24, Sisso Raz, Alicia
14-May-24, Tragen, Dawn
14-May-24, Lopes Dias, Alexander
14-May-24, ADAMS, CHARLES
14-May-24, Bowles, Lauren
14-May-24, Selwyn, Rebecca
14-May-24, Israel, Marcel
14-May-24, Bronzite, Ruth
14-May-24, Korn, Daniela
14-May-24, Rabson, Jonathan
14-May-24, Ferera, Leon
14-May-24, Westman, Jula
14-May-24, Press, Dan
14-May-24, Magnus, Alfred
14-May-24, Baum, Dennis
14-May-24, Soccio, Caroline
14-May-24, Goffe, Jude
14-May-24, Musikant, Adam
14-May-24, Sikking, Mary
14-May-24, Foreman, Bridget
14-May-24, Halon, Sally
14-May-24, Copisarow, Katharine
14-May-24, Lee, Lealiza
14-May-24, Ridgeway, Pauline Golda
14-May-24, Lurie, Kate
14-May-24, Hills, Christine
14-May-24, Shapiro, Melissa
14-May-24, Seymour, Ulla-Britt
14-May-24, Isaacs, Jonathan
14-May-24, Bekhor, Joseph
14-May-24, Goldstein, Michael
14-May-24, Sacerdoti, Daniel
14-May-24, Braude, Sheila
14-May-24, Marx, Jeanette
14-May-24, levinson, sharon
14-May-24, Hood, Sharon
14-May-24, Peters, Kathy
14-May-24, Brenner, Don
14-May-24, Goodenough, Sharon
14-May-24, Peever, Silvana
14-May-24, Borr, Barry

14-May-24, Young, Diana
14-May-24, Israel, Ruth
14-May-24, Orgel, Esti
14-May-24, Raingold, Jo
14-May-24, Marks, Joshua
14-May-24, Collovini, Chiara
14-May-24, Brand, Vadim
14-May-24, Goldstein, Ralph
14-May-24, Rothband, Nicole
14-May-24, Levenson, Yoel
14-May-24, Keats, Michael
14-May-24, Austen, Amanda
14-May-24, Videtzky, Joanne
14-May-24, Krom, Jodie
14-May-24, Landau, Rachel
14-May-24, Gouldman, Judith
14-May-24, Iarchy, Marc
14-May-24, Leventhal, Michael
14-May-24, Gold, Paul
14-May-24, Okrent, Sara
14-May-24, Gold, Isabel
14-May-24, Rubin, Suzanne
14-May-24, Gold, Elijah
14-May-24, Cousin, Yocheved
14-May-24, Segal, Richard
14-May-24, Shenker, Stephen
14-May-24, Pearl, Jennifer
14-May-24, Barkan, Limor
14-May-24, Stevens, Rich
14-May-24, Weiss, Maxime
14-May-24, Lavi, Roslyn
14-May-24, Ross, Reva
14-May-24, Wilks, Anne
14-May-24, GLATMAN, Zara Ruth
14-May-24, Israel, Adrien
14-May-24, Sher, Nicky
15-May-24, Kaufman, Martin
15-May-24, Marcus, Lucy
15-May-24, Mendleson, Elizabeth
15-May-24, Bedarida, Gabriella
15-May-24, Chalibamba, Michelle
15-May-24, Madeira Filipe, Andre
15-May-24, Klein, Mark
15-May-24, Piper, Esther

15-May-24, Cohen, Amalya
15-May-24, Cohen, Judith
15-May-24, Baer, Michael
15-May-24, Valencia, Esther
15-May-24, Vogel, Michele
15-May-24, Wilton-Morgan, Taylor
15-May-24, Levy KC, Robert
15-May-24, Flower, Isabelle
15-May-24, Palmer, Joel
15-May-24, Mourtzilas, Georgios Michail
15-May-24, Jackson, Michael
15-May-24, Erginsoy, Ali
15-May-24, Jackson, Judith
15-May-24, Julius, Lyn
15-May-24, Sneader, Philippa
15-May-24, Swade, Shelley
15-May-24, Hakim, Robert
15-May-24, Pinch, Sarah
15-May-24, Pereira-Mendoza, Marc
15-May-24, Dias, Daniel
15-May-24, Saleh, Ruth
15-May-24, Kay, Gideon
15-May-24, Rowland-Hill, Michael
15-May-24, Margetson, Zanine
15-May-24, Macmull, Ira
15-May-24, Dias, Lorraine
15-May-24, Martins Dos Santos, Jonatan Ismael
15-May-24, Kotlowski kinsley, sharna
15-May-24, SICSIC, Laurent
15-May-24, Silver, Jason
15-May-24, Nunes, David
15-May-24, Webber, Jonathan
15-May-24, Ozer, Ketty
15-May-24, Abulafia CBE FBA, Prof David
15-May-24, Jonas, Daniel
15-May-24, Garcia, Robyn
15-May-24, Goldin, Jon
15-May-24, Elia, Israel
15-May-24, Gee, L
15-May-24, birnbaum, Laura
15-May-24, da Mota, Leandro
15-May-24, Ozer, David
15-May-24, Chazan, Marcos
15-May-24, Marks, Simon

15-May-24, Dawood, Cindy
15-May-24, Salem, Mark
15-May-24, Sinyor, Pamela
15-May-24, Lebrecht, Elbie
15-May-24, Benaim, David
15-May-24, Shapiro, Caroline
15-May-24, Sieff, Alison
15-May-24, Masri, Danny
15-May-24, Rahamim, Marina
15-May-24, L, Matthew
15-May-24, Stolerman, Suad
15-May-24, Ashton, Martin
15-May-24, Perez, Lorna
15-May-24, Ibgui, Simon
15-May-24, Kopaloff, Stephen
15-May-24, Rahamim, Joseph
15-May-24, Eliasov, Dean
15-May-24, Mesrie, Elizabeth
15-May-24, Cohen, Samantha
15-May-24, Twena, Diane
15-May-24, Goodkind, Karen
15-May-24, gilbey, georgia
15-May-24, sueke, john
15-May-24, Kenley, Holly
15-May-24, Sabbah Bensimon, Raymond
15-May-24, ANI, MICHAEL
15-May-24, Sabbah Bensimon, Raymond
15-May-24, Rahamim, Vivian
15-May-24, Aaron, Scott
15-May-24, Sasson, Laura
15-May-24, Delvalle, Arthur
15-May-24, Kos-Est, Alessia
15-May-24, Foundation For, Jewish Heritage
15-May-24, Nunes Vaz, Joyce
15-May-24, Dawood, Richard
15-May-24, Schimmel, Noam
15-May-24, Turner, Joanne
15-May-24, Fhima, Simon
15-May-24, Sopher, Edward
15-May-24, Dacosta, Bernice
15-May-24, Cowen, Anne
15-May-24, adler, sarah
15-May-24, Hornstein, Rodney
15-May-24, Newman, Amanda

15-May-24, Golanski, Karen
15-May-24, Hurst, Ann Stephanie
15-May-24, Rejwan, Salman
15-May-24, JNatali, JNatali
15-May-24, Turner, Jacob
15-May-24, Speigel, Maureen
15-May-24, Attan, Mark
15-May-24, Dias, Max
15-May-24, Maya, Gaston
15-May-24, Ward, Joanna
15-May-24, Gilmont, Jason
15-May-24, Garcia, Philip
15-May-24, Sabbah, Nethali
15-May-24, Gleen, Carmen
15-May-24, Dale, Priscilla
15-May-24, Wood, Abigail
15-May-24, Smouha, Derrick
15-May-24, Silver, Rachael
15-May-24, Bard, Julia
15-May-24, Rubie, Michael
15-May-24, Wake-Walker, Richard
15-May-24, Rubie, Michael
15-May-24, Goldstein, Adele
15-May-24, Bowman, Andrew
15-May-24, Phillips, Keith
15-May-24, Grossman, Seth
15-May-24, Moss, Martin
15-May-24, Castiel, Gilah
15-May-24, Ettinghausen, Daniel
15-May-24, shaoul, doreen
15-May-24, Wassermann, Charlotte
15-May-24, Keiner, Judy (Celia Judith)
15-May-24, Wan, Elizabeth
15-May-24, Guivarch, Johanna
15-May-24, ZEHAVI, Leora
15-May-24, Ashton, Paul
15-May-24, Abery, Nic
15-May-24, Bloch, Anna
15-May-24, Eddy, Nathan
15-May-24, Sidley, Deanna
15-May-24, Jammer, Leon
15-May-24, Blackshaw, Myer
15-May-24, BEN-NATHAN, Geoffrey
15-May-24, Cuby, Dahlia

15-May-24, Schmetterling, Dori
15-May-24, Arkush, Jonathan
16-May-24, Glaser, Robert
16-May-24, McKinstry, David
16-May-24, Hakim, Jonathan
16-May-24, Jackson, Adam
16-May-24, richards, ivor
16-May-24, Harris, Josh
16-May-24, Walker, Susan
16-May-24, Catignani, Sergio
16-May-24, Sochall, Ingrid
16-May-24, Joshua, Michael
16-May-24, Jolly, Andrew
16-May-24, HOPKINS, PAUL
16-May-24, Freudenthal, Bernard
16-May-24, Natali, David
16-May-24, Pereira-Mendoza, David
16-May-24, Priddle, Stephen
16-May-24, Dreyfuss, Vera
16-May-24, Bahar, Raquel
16-May-24, Roberts, Elaine
16-May-24, Adler, Elias
16-May-24, Hart, Barbara
16-May-24, Brown, Louise
16-May-24, Goldsmith, Jonathan
16-May-24, ISAAC, LORRAINE
17-May-24, Chandler, Julie
17-May-24, Kerbel, Sorrel
17-May-24, Kerbel, Sorrel
17-May-24, Juggler Crook, Lauren
17-May-24, Ben hur, Sharon
17-May-24, Yuchetel, Richard
17-May-24, Oyawale, Agnita
17-May-24, Wiseman, David
17-May-24, Wilkinson, Guy
17-May-24, Bear, Michael
17-May-24, Davies, Beryl
17-May-24, Beradida, Micol
17-May-24, L sner, Susan
18-May-24, Straus, Martin
18-May-24, Cave, John Nigel
18-May-24, Rozas, Simon
18-May-24, Whitear, Nick
18-May-24, Roberts, David

18-May-24, Segall, Marilyn
19-May-24, Hasson, Steven
19-May-24, Morgan, Susan
19-May-24, Myers, Sidney
19-May-24, Beral, Mike
19-May-24, Somekh, Natalie
19-May-24, Mann, Deborah
20-May-24, Cowan, David
20-May-24, Schiller, Michael
20-May-24, Gelbier, Stanley
20-May-24, Brent, Janice
20-May-24, Osen, Elana
20-May-24, Fox, Julie
20-May-24, Jacobs, Tony
21-May-24, Van Straten, Craig
21-May-24, Pinto, Ruby
21-May-24, Arden, David
21-May-24, Adam, Ralph
21-May-24, Hojsteen, Architect Aharon
21-May-24, Amal, Ruti
21-May-24, Storey, Nicholas
21-May-24, Amar, Janine
21-May-24, Main, Kathryn
21-May-24, Blasebalk, Tony
21-May-24, Litwin, Holly
21-May-24, Seaford, William
22-May-24, Malins, Leo
22-May-24, Mautner, Roger
22-May-24, Findlay, Katherine
22-May-24, Halfon, Daniel
22-May-24, Klionsky, Naomi
22-May-24, Roodyn, Michael
22-May-24, Mourtzilas, George-Michael
22-May-24, Berman, Gerald
22-May-24, Weiner, Estelle
23-May-24, Frost, Adele
23-May-24, Szlesinger, Brenda
23-May-24, Rodrigues Pereira, Nachshon
23-May-24, Filer, Wendy
24-May-24, Reeve, Yvonne
24-May-24, Evans, Nicholas
24-May-24, King, Norman
24-May-24, Grossman, Jenni
25-May-24, O?Shea, Elaine

25-May-24, Papouchado, Elliot
25-May-24, Goldberg, Ivor
25-May-24, Hanks, John
25-May-24, Cohen, Jonathan
26-May-24, Burg, Jonathan
26-May-24, Gilbert, Richard
26-May-24, Marks, June
26-May-24, Marnham, Andrew
27-May-24, Sepulveda, Elishevah
27-May-24, Gocman, Michael
27-May-24, Needham, William
28-May-24, Fairbairn, Barrie
28-May-24, Judah, Jonny
28-May-24, Johnson, Colin
28-May-24, Hales, Allan
29-May-24, Mendoza, David
29-May-24, Ehrlich, Daniel
29-May-24, Rafaeli, Barbara
29-May-24, Roback, Deborah
29-May-24, Leigh, Lord
29-May-24, Edwards, L Joan
29-May-24, Bear, Michael
29-May-24, Rothman, Gerald
29-May-24, Sloam, Nigel
29-May-24, Morganstein, Louise
29-May-24, Eskenzi, Anthony N
29-May-24, Rowland, Jon
29-May-24, Lincoln, Francesca Raphael
29-May-24, Gordon, Mark
29-May-24, Jacobus, Laura
29-May-24, Dimoldenberg, Paul
29-May-24, Jorgensen, Reverend Laura
29-May-24, Brennan, Clare M
29-May-24, Callaghan SJ, Brendan
29-May-24, Cherry, Brigid
29-May-24, Parkes, Henrietta
29-May-24, Ruben, Caroline
30-May-24, Barkway, Janet
30-May-24, Stern, Sharon
30-May-24, Birrell, Stephen
30-May-24, Kaufmann, Aviva
30-May-24, Eirew, Gabrielle
30-May-24, Baum, Colin
30-May-24, Samuels, Adrian

31-May-24, Kielty, Pauline
31-May-24, Royo Moreno, Luis J
31-May-24, Applegate, Sharon
01-Jun-24, Booth, Judith
01-Jun-24, Richardson, Will
02-Jun-24, Cable, Rory
02-Jun-24, Shahrabani, Ihsan or Eliyahu
02-Jun-24, Shahrabani, Ihsan or Eliyahu
02-Jun-24, Viana de Oliveira, Sezefredo
02-Jun-24, Viana de Oliveira, Sezefredo
02-Jun-24, Howell, Jacqueline
03-Jun-24, Levin, Brian
04-Jun-24, Goodman, Namy
04-Jun-24, Jackson, Matthew
04-Jun-24, Spencer, Michael
04-Jun-24, Johnson, Rachel
04-Jun-24, Gubbay, Candice
04-Jun-24, Glyn, Simon
04-Jun-24, Glyn, Tamar
04-Jun-24, Singer, Amanda
04-Jun-24, Barrie, Francine
04-Jun-24, Cohen, Sasha
04-Jun-24, Cohen, Warren
04-Jun-24, Barrie, Michael
04-Jun-24, Shaw, Julian
04-Jun-24, Shaw, Karen
04-Jun-24, Einhorn, Hilary
05-Jun-24, Tenzer, Karen
05-Jun-24, Parton, Adam
07-Jun-24, Smith, Amanda
07-Jun-24, Beloff, Jonathan
08-Jun-24, Henley, R
12-Jun-24, Jacobs, RIchard
18-Jun-24, Clapinson, Hannah
18-Jun-24, Forshaw, Kirsty
18-Jun-24, Rosen, Andrea
18-Jun-24, Keeney, Katie
19-Jun-24, The Honourable Company of Master Mariners,
19-Jun-24, Lester, Sara Kyte
19-Jun-24, Hepher, Roger
19-Jun-24, Arwas, Paul
19-Jun-24, Filipe, Andre
19-Jun-24, Shiach, Gordon
19-Jun-24, Woolich, Anthony

19-Jun-24, Beenstock, Gerrard
19-Jun-24, Florentin-Lee, Balthazar
19-Jun-24, Emerson, Christina
19-Jun-24, Aiken MP, Nickie
19-Jun-24, McLeod, Stuart
19-Jun-24, Lyons, Simon H
19-Jun-24, Samuel, Hope
20-Jun-24, Lebon, Scott
24-Jun-24, Miles, Keith
24-Jun-24, Epand, Ted
25-Jun-24, Winston, Steven
25-Jun-24, Kalev, David
25-Jun-24, Levy, Daniel
25-Jun-24, Kett, Russell
25-Jun-24, Burchell, James
25-Jun-24, Loftus, Jacob
26-Jun-24, Martins, Jonathan
26-Jun-24, Verber, Naomi
26-Jun-24, Benjamin, William
26-Jun-24, Ross, Michael
26-Jun-24, Jackson, Alexandra
01-Jul-24, Garbett, Zoe
01-Jul-24, Morris, Alexander
01-Jul-24, Jacobus, Laura
01-Jul-24, BEN-NATHAN, Geoffrey
01-Jul-24, Judaism, Messiah Is
01-Jul-24, Morris, Shalom
01-Jul-24, Tidswell, Bella
02-Jul-24, Black, Keith
02-Jul-24, Der Zyl, Marie Van
02-Jul-24, E M Johnson, Rachel
02-Jul-24, Gartenberg, Peter
02-Jul-24, Heller, Daniel
03-Jul-24, Salem, David
03-Jul-24, Samuel, Tony
03-Jul-24, Shaw, Geoffrey
08-Jul-24, Whyte, Christopher
08-Jul-24, Eldridge, Charlotte D'Alton
08-Jul-24, Phillips, Jackie
08-Jul-24, Goldberg, Rachelle
08-Jul-24, Barber, Keith
09-Jul-24, Frankenberg, Paul
09-Jul-24, The Honourable Company of Master Mariners,
09-Jul-24, The Honourable Company of Master Mariners,

10-Jul-24, Dremach, Agniya
10-Jul-24, Tessa Sanderson, Troy Richards &
10-Jul-24, Salem, Freddy
10-Jul-24, Carp, Debbie
10-Jul-24, Sackman, Sarah
15-Jul-24, Fox, Julie
15-Jul-24, Einhorn, Stanley
22-Jul-24, Gleen, Carmen
22-Jul-24, Magnus, Alfred
22-Jul-24, Yudkin, Michael
23-Jul-24, Dweck, Joseph
23-Jul-24, Palmer, Joe
24-Jul-24, Mirvis, Ephraim
03-Sep-24, Chambers, Christopher
11-Sep-24, Keliris, Jan
11-Sep-24, Samuels, Lydia
11-Sep-24, Shovelton, Claire
11-Sep-24, Asare-Djan, Jeorge
11-Sep-24, Chohan, Tej
16-Sep-24, Greenhalf, Mike
18-Sep-24, Hood, Ralph
18-Sep-24, Lemanski, Mark
24-Sep-24, King, Emma
24-Sep-24, Dell, Becky
09-Oct-24, Blain, Barry
09-Oct-24, Gauthier, Charlotte
10-Oct-24, Jacobson, David
14-Oct-24, Bennett, sarah
15-Oct-24, Baharier, Linda
15-Oct-24, Goldsmith, Jonathan
15-Oct-24, Rose, Peter
15-Oct-24, Green, Edwin
15-Oct-24, Frost, Adele
15-Oct-24, Mendoza, David
15-Oct-24, Amado, Can
15-Oct-24, Parsons, Kathleen
15-Oct-24, Eskenzi, Anthony N
15-Oct-24, Jackson, Judy
16-Oct-24, Wakeman, Lindsay
16-Oct-24, Platt KC, Eleanor
16-Oct-24, Salako, Ara
16-Oct-24, Parker, Christopher
16-Oct-24, Blaga, Erika
21-Oct-24, Salter, Amy

21-Oct-24, Mendoza, David
22-Oct-24, Burg, Jonathan
22-Oct-24, Solomons, Jonathan
29-Oct-24, Denham, J
31-Oct-24, Stone, Jeremy
05-Nov-24, Amado, Can
05-Nov-24, Callaghan SJ, Brendan
05-Nov-24, Gauthier, Charlotte
05-Nov-24, Teeger, Edward
05-Nov-24, Moreland, Lee S
05-Nov-24, Patel, Dhruv
05-Nov-24, Roache, Anne
07-Nov-24, Jessop, Manuella
07-Nov-24, Jessop, David
11-Nov-24, Moses, Selina
12-Nov-24, Burg, Jonathan
12-Nov-24, Dimoldenberg, Paul
12-Nov-24, Ben Garcia, Lawrence
13-Nov-24, Green, Charlotte
13-Nov-24, Bonnet, Joel
13-Nov-24, Jackson, Judy
13-Nov-24, Sicsic, Laurent
13-Nov-24, Timan, Ezra
13-Nov-24, Timan, Ruth
13-Nov-24, Obadiah, Sophie
13-Nov-24, Morgan, Leslie
13-Nov-24, Morgan, Cyril
13-Nov-24, Zubaida, David
13-Nov-24, Mendoza, Alan
13-Nov-24, shamash, david
13-Nov-24, Baroukh, Vivien
13-Nov-24, Bilbul, Jonathan
13-Nov-24, Lampert, Dorothy
13-Nov-24, Salem, Freddy
18-Nov-24, Conolly, Paul
19-Nov-24, Yudkin, Ben
19-Nov-24, Bogod, Howard
19-Nov-24, Ridler, Katharine
19-Nov-24, Jacobs, Everett M
19-Nov-24, Felcher, Dave
19-Nov-24, Lawrence, Beverley
19-Nov-24, Lieber, Stephanie
19-Nov-24, Timan, Ruth
19-Nov-24, Sacerdoti, Daniel

19-Nov-24, Schmool, Marlena
19-Nov-24, Kramer, Miriam
19-Nov-24, Kramer, Stephen
20-Nov-24, Hepher, Roger
20-Nov-24, Green, Michael
20-Nov-24, Album, Edward
20-Nov-24, Rosen, Andrea
20-Nov-24, vogel, mira
21-Nov-24, Halpern-Matthews, Dalia
22-Nov-24, Fox, Vicki
22-Nov-24, Jackson, Elizabeth
22-Nov-24, Kirby, Jack
23-Nov-24, Shindler, Jeremy
25-Nov-24, Gomes da Costa, Marcus
25-Nov-24, Singh, Param
25-Nov-24, Halpern-Matthews, Dalia
25-Nov-24, Coriell, Lois
25-Nov-24, Jackson, LiLi
25-Nov-24, Kirby, Keith
26-Nov-24, Gordon, Henrietta
26-Nov-24, Clucas, Jane
26-Nov-24, Jeanette R, Rosenberg
26-Nov-24, Warlow, Neil
26-Nov-24, Hopson, Jacqueline Langer
26-Nov-24, Brodie, Philip
26-Nov-24, Brett, Richard
26-Nov-24, Paldi, Amnon
26-Nov-24, Say, Nathan
26-Nov-24, Allan, Tony
26-Nov-24, Seres, Jennye
26-Nov-24, Musikant, Kris
26-Nov-24, Hillman, Basil
26-Nov-24, Patchick, Jonathan
26-Nov-24, Costa, Marcus Da
26-Nov-24, Blake, Rachel
26-Nov-24, Stern, Gerald
26-Nov-24, Musikant, Barry
26-Nov-24, hoffman, jonathan
26-Nov-24, Ten Dam, Melissa
26-Nov-24, Barton, Isn
26-Nov-24, Reginald, S
26-Nov-24, Risenbaum, Danny
27-Nov-24, Pollak, Miriam A.
27-Nov-24, Yudkin, Michael

27-Nov-24, Black, Pat
27-Nov-24, Walker, Anne
27-Nov-24, Keiner, Judy (Celia Judith)
27-Nov-24, Musikant, Adam
27-Nov-24, Simon, Barbara
27-Nov-24, Schonfield, Jeremy
27-Nov-24, Schonfield, Tamar
27-Nov-24, Johns, Leslie
28-Nov-24, Rabbs, Margaret
28-Nov-24, Winch, Dinah
28-Nov-24, Lawson, Susannah
28-Nov-24, Ozer, Ketty
28-Nov-24, Sackman, Simon
28-Nov-24, Chait, Stan
28-Nov-24, Collins, Peta
28-Nov-24, Berman, Gerald
29-Nov-24, Issroff, Rahle
29-Nov-24, Natali, P
29-Nov-24, Gardiner, Marc
30-Nov-24, Freeman, Julian
30-Nov-24, Baxter, Christina
30-Nov-24, O?Hara, Moya
01-Dec-24, Morley, James
02-Dec-24, Segall, Edwin
02-Dec-24, Natali, P

Representations/Consultation Responses

15/03/2024 - NATS Safeguarding
19/03/2024 - London City Airport
20/03/2024 - Active Travel England
20/03/2024 - Heathrow Airport Limited
21/03/2024 - Crossrail Safeguarding
26/03/2024 - Environment Agency
02/04/2024 - Historic England
02/04/2024 - Air Quality Officer
03/04/2024 - Environmental Resilience Officer
03/04/2024 - Westminster City Council
03/04/2024 - Gardens And Cleansing
04/04/2024 - Thames Water
04/04/2024 - Thames Water
09/04/2024 - Transport For London

12/04/2024 - Southwark Council
01/05/2024 - Save Britain's Heritage
08/05/2024 - The Georgian Group
08/05/2024 - Natural England
14/05/2024 - The London Borough Of Tower Hamlets
14/05/2024 - Historic Royal Palaces
14/05/2024 - Transport For London
14/05/2024 - The Society For The Protection Of Ancient Buildings
15/05/2024 - Surveyor To The Fabric - St. Paul's Cathedral
15/05/2024 - Historic England
17/05/2024 - Twentieth Century Society
17/05/2024 - The Victorian Society
17/06/2024 - Historic England
25/06/2024 - London Borough Of Camden
02/09/2024 - Environmental Resilience Officer
08/10/2024 - Lead Local Flood Authority
08/10/2024 - District Surveyors Office
08/10/2024 - Historic England
09/10/2024 - Environmental Health Officer
09/10/2024 - Heathrow Airport Limited
09/10/2024 - Thames Water
09/10/2024 - Active Travel England
10/10/2024 - Historic England
11/10/2024 - Crossrail Safeguarding
14/10/2024 - District Surveyors Office
15/10/2024 - London City Airport
16/10/2024 - Air Quality Officer
18/10/2024 - Environment Agency
24/10/2024 - The Georgian Group
25/10/2024 - Crossrail Safeguarding
25/10/2024 - Westminster City Council
30/10/2024 - Active Travel England
31/10/2024 - Heathrow Airport Limited
01/11/2024 - Crossrail Safeguarding
01/11/2024 - London City Airport
04/11/2024 - Natural England
06/11/2024 - The Society For The Protection Of Ancient Buildings
06/11/2024 - Save Britain's Heritage
07/11/2024 - Historic England
11/11/2024 - Southwark Council
11/11/2024 - The London Borough Of Tower Hamlets
11/11/2024 - Twentieth Century Society
13/11/2024 - Natural England
15/11/2024 - Environment Agency

15/11/2024 - London Borough Of Camden
18/11/2024 - Access Advisor
18/11/2024 - Historic England
21/11/2024 - Historic Royal Palaces
24/11/2024 - Community Facilities Manager (Public Conveniences)
25/11/2024 - Ministry of Housing, Communities & Local Government

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in this report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Lift Vehicle Maintenance Strategy, a Travel Plan. Mitigation measures should be secured including wind mitigation to the Level 7 of the proposed development. These as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure

- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning

- Accessible London: Achieving an Inclusive Environment SPG (October
- 2014);
- Control of Dust and Emissions during Construction and Demolition SPG
- (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016)
- Mayor’s Transport Strategy (2018)

Emerging City Plan 2040

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities

- Policy HL6: Public Toilets
- Policy HL7 Sport and Recreation
- Policy HL8 Play areas and facilities
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment
- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace
- Policy OF3 Temporary ‘Meanwhile’ Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts
- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets

- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S12: Tall Buildings
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S21: City Cluster
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

• Planning for Sustainability November 2023
• Lighting SPD, October 2023
• Developer Engagement Guidance PAN, May 2023
• Carbon Options Guidance PAN, March 2023
• Preventing suicides in high rise buildings and structures PAN, November 2022
• City of London Thermal Comfort Guidelines (2020)
• Wind Microclimate PAN, August 2019
• Sunlight PAN, July 2017
• Solar Glare PAN, July 2017
• Solar Convergence PAN July 2017
• Archaeology in the City PAN,
• Air Quality SPD, July 2017
• Archaeology and Development Guidance SPD, July 2017
• Freight and Servicing SPD February 2018
• City Public Realm SPD (CoL, July 2016);

- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS7 Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City, by:

1. Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock.
2. Promoting the Eastern Cluster as a location for inward investment, providing assistance to potential developers, investors and occupiers.
3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.
4. Ensuring the safety of businesses, workers, residents and visitors, promoting natural surveillance of buildings, open spaces and streets and protecting against crime and terrorism.
5. Enhancing streets, spaces, and the public realm for pedestrians, providing new open and public spaces where feasible, increasing connectivity with surrounding areas and improving access to facilities and services, particularly in the Cheapside and Aldgate areas and towards the City Fringe.
6. Ensuring the provision of high quality utilities (including CCHP where feasible) and communications infrastructure, encouraging early engagement and joint working between developers and utility providers and maximising the space under the streets, particularly through the use of pipe subways.
7. Delivering improvements to public transport to cope with the demands of the growing numbers of workers and visitors, implementing street and traffic management measures and ensuring that improvements do not compromise the quality of the environment.

CS10 Design

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage

and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall Buildings

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
4. Ensuring that tall building proposals do not adversely affect the operation of London's airports

CS15 Sustainable development and climate change

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open Spaces and Recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy DM 3.1 Self-containment in mixed use developments

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;
c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

a) conducting a full risk assessment;
b) keeping access points to the development to a minimum;
c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
d) ensuring early consultation with the City of London Police on risk mitigation measures;
e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;

b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
c) appropriate, high quality and durable materials are used;
d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
k) there is provision of amenity space, where appropriate;
l) there is the highest standard of accessible and inclusive design

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:
a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.
2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:
a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

Policy DM 10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:
• respect the quality and architectural contribution of any existing shopfront;
• respect the relationship between the shopfront, the building and its context;
• use high quality and sympathetic materials;
• include signage only in appropriate locations and in proportion to the shopfront;
• consider the impact of the installation of louvres, plant and access to refuse storage;
• incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
• not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
• resist external shutters and consider other measures required for security;
• consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
• be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

Policy DM 10.6 Advertisements

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;

b) ensuring that financial provision is made for the future maintenance of new public art;

c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Ancient monuments and archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational

noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

Policy DM 16.6 Public car parks

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;
b) building design which minimises wastage and makes use of recycled materials;
c) recycling of deconstruction waste for reuse on site where feasible;
d) transport of waste and construction materials by rail or river wherever practicable;
e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;

b) the benefits of the development outweigh the flood risk to future occupants;

c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

Policy DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

a) green roofs and walls, soft landscaping and trees;
b) features for wildlife, such as nesting boxes and beehives;
c) a planting mix which encourages biodiversity;
d) planting which will be resilient to a range of climate conditions;
e) maintenance of habitats within Sites of Importance for Nature Conservation.

Policy DM 20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000m2) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

• requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;

• supporting an increase in the membership of the Community Toilet Scheme;

• resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;

• taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Appendix C

Methodologies for Assessing Daylight, Sunlight and Overshadowing

Existing Buildings

Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

1**. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

2. **Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE guidelines recommends compliance with both the VSC and daylight distribution (NSL) assessment criteria.

Sunlight to Existing Buidlidings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although

care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

• Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
• Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
• Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Interpreting Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

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

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

Open Spaces

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun 494 is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the draft City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

SCHEUDULE

Application: 24/00021/FULEIA

Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

The application is accompanied by an Environmental Statement. Members of the public may obtain copies of the Environmental Statement at a charge from Trium at olivia.allchorn@triumenv.co.uk.

CONDITIONS

Time Limit for Commencement	
1	**Time Limit** The development hereby permitted shall be begun before the expiration of three years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
Environmental Health	
2	**Scheme of Protective Works - demolition** There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of

	Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
3	**Scheme of Protective Works - construction** There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
4	**Noise, dust and vibration monitoring equipment** Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works.

	REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
5	**Acoustic Report** Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used to demonstrate that noise levels from the proposed Rehearsal & event space/Sports facilities area shall not exceed the existing background level (lowest LA90(15min)) at 1m from the nearest noise sensitive receptor. The development pursuant to this permission shall be carried out in accordance with the approved scheme and maintained thereafter. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
6	**Opening Hours Terraces and Balconies** The office terraces and public terrace (Urban Farm) hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
7	**Amplified Music** No amplified or other music shall be played on the roof terraces. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
8	**Plant Noise** (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels

	should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
9	**Sound Insulation office/non-office** The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall submitted to and approved in writing by the Local Planning Authority. REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
10	**Fume extract arrangement** Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the proposed café use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
11	**Mounting of plant** Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

	REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
12	**Contamination** No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
13	**Contamination** Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify

	as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
14	**Sewer Vents** Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building. REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
SUDS/Water	
15	**SuDS** Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m3 ;

	(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
16	**SuDS Maintenance** Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
17	**Thames Water** No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason: The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

18	**Thames Water – Piling Method Statement** No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.
Archaeology	
19	**Stage 1 Written Scheme of Investigation** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

	REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
20	**Written Scheme of Investigation Preparation** Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
21	**Public Engagement** No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
22	**Foundation design** No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
23	**City Airport – Building Obstacle Lighting Condition** Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q ‘Visual Aids for Denoting Obstacles’ and will be

	installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development. Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.
Sustainability	
24	**Circular Economy** (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. (b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 ; S16, CEW 1.
25	**Post-construction Circular Economy** No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the 501 proposed targets stated

	in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
26	**Whole life-cycle carbon emissions** Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark (as current at the time of submission) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life-cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2.
27	**Post-construction whole life-cycle carbon emissions** Once the as-built design has been completed (upon commencement of RIBA Stage 6 the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk

	REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
28	**Façade System** Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings. REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.
29	**District Heating Network connection** The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
33	**Climate change resilience measures – completion details** Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
31	**BREEAM** A post construction BREEAM assessment for each use demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local

	planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
32	**Updated Biodiversity Net Gain** Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
33	**Ecological Management Plan** Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided • Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development
34	**Post Construction UGF and BNG** Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat

	species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.
Design/Public Realm including Lighting	
35	**Faience façade details** Before the works thereby affected are begun, sample panels of agreed sections of the faience facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
36	**Design and materials – Tower and Renown House** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces; (b) details of the proposed new facade(s) including typical details of the fenestration and entrances; (c) details of a typical bay of the upper floors of the development (including the tower bays and the roof extensions to Renown House); (d) details of the ground floor triple order and cornice; (e) details of the internal elevations of the Heneage Arcade including the entrances, shopfronts, soffits, walls, lighting, paving, water fountain and any infrastructure required to deliver programmed and varied uses; (f) details of the entrances at Ground, Mezzanine and Level 1 including details of external and internal level ground to first floor including: all elevations: entrances: fenestration; internal circulation and fit out; planters; fixed seating; fixed lighting; signage; and any infrastructure required to deliver the Sui Generis use; (g) details of the proposed programme of public art throughout the external surfaces and faces of the building;

	(h) details of the urban greening proposed throughout the external surfaces and faces of the building; (i) details of the proposed external lighting scheme proposed throughout the external surfaces and faces of the development; (j) details of James Court, including elevations, climbing wall, art wall planters, seating, lighting, wind mitigation measures, drainage, irrigation and any infrastructure required to deliver programming and varied uses; (l) details of junctions with adjoining buildings; (m) details of the integration of window cleaning equipment, building maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level (n) details of the integration of cleaning equipment, cradles and the garaging thereof; (o) details of plant and ductwork to serve the Class E use(s); - (p) details of ventilation and air-conditioning for the Class E use(s); (q) details of all ground level surfaces including materials to be used; (r) details of external surfaces within the site boundary including hard and soft landscaping (s) details of the works to the entrances and facades of Renown House including but not limited to details of the proposed fenestration, the creation of new, level entrances and any requisite works or cleaning and repairs, and particulars and samples thereof; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
37	**Holland House and Bevis Marks Synagogue - Demolition and Construction Methodology and Structural Assessment** Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and long-term structural and non-structural implications for the listed buildings Holland House (Grade II*) and Bevis Marks Synagogue (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House and Bevis Marks Synagogue in accordance with the following policies of the Local Plan: CS12, DM12.1.

38	**Holland House – site meeting** Before work begins a site meeting shall be held between the local planning authority and the persons responsible for undertaking the works to ensure that the Conditions attached to the Listed Building Consent are understood and can be complied with in full. Notification of the date and time of a meeting shall be made in writing to the Local Planning Authority. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
39	**Holland House - qualified professional specialising in conservation work** Before work begins it shall be agreed in writing with the Local Planning Authority the appropriately qualified professional specialising in conservation work who will supervise the hereby approved works of alteration or demolition. Any proposed changes to the agreed supervision arrangements shall be subject to the prior written agreement of the Local Planning Authority. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1
40	**Holland House - Details** Before work begins the following shall be approved in writing by the Local Planning Authority. The work shall be carried out in full in accordance with approved details including: 1. Façade repairs and alterations a. Particulars and samples of materials to be used on all external faces of the building including external ground and upper level surfaces b. A method statement for cleaning and repair c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. Details of the reopening of the Bury Street entrance and other alterations 2. Repair works to the steel structure a. A condition survey of the existing historic structure b. A method statement for repair works c. A schedule of works and specification 3. Window Replacements a. Particulars and samples of the proposed windows b. A method statement for construction and installation c. A schedule of works and specification 4. Tenants entrance (west elevation) a. Particulars and samples of all materials and features b. A method statement for construction and installation 5. East Elevation (external wall)

	a. A condition survey of the historic fabric behind modern Portland stone b. Particulars and samples of proposed materials c. A method statement for construction and installation d. A schedule of works and specification 6. East Elevation (party wall with Bury House) a. Details of the interconnections between the listed building and the proposed tower floor levels, including alignment and connection of floor slabs and the new lift core 7. Internal works a. Details of works to the Heritage Lobbies including but not limited to any requisite repairs and particulars and samples of the materials thereof; b. Details of the works to the Atrium including but not limited to the junctions of the new floor slabs with the existing elevations, requisite repairs and particulars and samples of the materials thereof, and its presentation c. Details of works to the first floor Heritage Interiors, including but not limited to any repairs, minor alterations and works of re-presentation 8. South Elevation (party wall with Renown House) a. Details of the proposed extension of the floor slabs of the listed building behind, and their junctions with, the retained elevations of Renown House b. Details of the treatment of the retained sections of party wall between Renown House and Holland House 9. Rooftop additions a. Particulars and samples of materials to be used on all external faces of the building b. A method statement for demolition of existing upper level floors and construction of new structure and facades c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. External Lighting and landscaping at roof level 10. Details of junctions with adjoining buildings; 11. Details of the integration of window cleaning equipment, building maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level; 12. Details of ventilation and air-conditioning; 13. Details of external surfaces within the site boundary including hard and soft landscaping; REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
41	**Holland House – tilework replacement or repairs** Prior to practical completion, details of any other repairs and replacement tilework to the elevations resulting from further investigations shall be submitted to and

	approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
42	**Holland House – precautions to secure features during building work** Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the interior and exterior features during the building work. The agreed measures shall be carried out in full. No such features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
43	**Holland House - new works and finishes to match the existing** All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
44	**Suicide Prevention** Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:, CS3, DM3.2 DM10.1 and DM12.2.
45	**Security** Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in

	writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
46	**Public art strategy** Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: Details of a new public art strategy within the public realm or on buildings where appropriate and which is of artistic merit, is deliverable and can be maintained shall be submitted to and approved in writing by the Local Planning Authority. The public art installations shall be carried out as approved and so maintained for the life time of the development. REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2
47	**Urban Greening** Before any works hereby affected are begun, details of a holistic urban greening strategy including hard landscaping, materials and an appropriate maintenance regime for a. planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; b. the incorporation of green roofs into roof surfaces; and c. the landscaping of the public realm Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
48	**Street lighting**

	Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1.
49	**Lighting including aviation** Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: - lighting layout/s; - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure); - a lighting control methodology; - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering. - details of aviation lights including locations All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15.
50	**Landscaping** All landscaping, including the ground floor and external terraces, shall be treated in accordance with a landscaping scheme, including details of:

	a. Irrigation; b. Provision for harvesting rainwater run-off from road to supplement irrigation; c. Spot heights for ground levels around planting pit; d. Soil; e. Planting pit size and construction; f. Tree guards; and g. Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. To be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
51	**Greening/ landscaping/ public realm** Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds; b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium; c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation; d) Details of the method of irrigation and nutrient delivery systems; e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures; f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; g) Details of landscape lighting; h) A management and maintenance Plan (including ecological management) for all proposed landscaping; and i) Details of permanent wayfinding features and other installations.

	All unbuilt and built surfaces, including the ground floor and roof levels landscaping, shall be treated in accordance with a landscaping scheme, including details of: i) Irrigation; ii) Provision for harvesting rainwater run-off from road to supplement irrigation; iii) Spot heights for ground levels around planting pit; iv) Soil; v) Planting pit size and construction; vi) Tree guards; and vii) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development viii) the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; ix) the incorporation of blue roofs into roof surfaces; x) the landscaping of the public realm; All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4, DM12.2 and DM19.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040.
52	**Green wall(s)** Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
53	**Green wall(s) maintenance** Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the

	local planning authority before any works to install such green wall(s)/roof(s) are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2
Accessibility	
54	**Inclusive Signage and wayfinding** Prior to commencement of the development excluding demolition, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, flexible uses, including cultural, community, educational, sports, multi-faith and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
55	**Public toilets** Before any construction works hereby permitted are begun details, including drawings at a scale of no less than 1:20, shall be submitted to and approved in writing by the local planning authority of: a. Changing Place, wheelchair accessible and ambulant accessible toilet and baby changing facilities at ground floor level within the building hereby approved; and b. associated signage The approved facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development. REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.
56	**Inclusion and accessibility**

	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) All surface materials including details of slip resistance, contrast, colour, texture and acoustic properties, as appropriate b) Details of wider aisle gates at all controlled points of entry c) Details of planting and maintenance for areas of landscape including how unwelcome touch and scent can be avoided d) Glare analysis for cladding materials e) An inclusive entrances strategy with details of controlled entry systems, entrance doors, thresholds, mat materials, contrast and manifestations with drawings at a scale of no less than 1:20 (as relevant) f) Details and specification for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions g) Review of potential provision of Mobility Scooter charging with associated fire-protection measures h) Provision of quiet rooms for rest and recovery where appropriate i) Details of all shopfronts including plans and elevations at a scale of no less than 1:20 to ensure that doors are of sufficient width and have suitable door furniture and surface contrast j) Details of inclusive gym facilities REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan
57	**Inclusive Access Management Plan** Before any works thereby affected are begun the following Inclusive Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: 1) Website information including photos and an easy read version with information on: a) Travel distances from key points of arrival and rest points b) Location of dropped kerbs c) A protocol for users of the accessible parking bay for disabled users of the development. This should include, but not be limited to: i) Dimensions of the bay and protected zones

	ii) Protocol for reserving the bay iii) Protocol for guided entry into the space iv) Protocol for requesting departure from the space v) Any time limits on occupancy of the space d) Facilities available on site including dimensions and photos for (as appropriate): i) Step-free entrance points and entrances and lift access ii) controlled entry points (showing wider gates) iii) accessible toilets including access to keys for operation including at ground floor and iv) Changing Places toilets provision including but not exclusively at ground floor and for the other publicly accessible areas v) Baby changing facilities including at ground floor and for the other publicly accessible areas vi) 'universal', female and male toilet provision at ground floor and for the other publicly accessible areas vii) facilities for assistance animals viii)equipment loan ix) assistive listening system and other assistive technology x) rest and recovery facilities xi) room for reflection/quiet room xii) community, cultural, sports, educational, multi-faith space xiii)plant species 2) Inclusive community, cultural, sports, educational, multi-faith provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering. 3) Inclusive Entrances Strategy 4) Cleaning and maintenance schedule for lifts to ensure that the lifts are kept clean, in good working order, and available at all times, with lift users kept separate from the refuse store 5) inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs) The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan
Highways and Transportation	
58	**Refuse/ Recycling Storage and collection** Refuse and recycling, storage and collection facilities shall:

	(a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) thereafter be maintained as approved throughout the life of the building. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
59	**Restricting numbers of deliveries/servicing** There shall be no more than 33 delivery and servicing motorized vehicle daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50%). REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
60	**Restricting Hours of deliveries and servicing** No deliveries and servicing trips to the premises shall be carried out between the hours of 7:00 to 9:00, 12:00 to 14:00, 16:00-18:00 and the hours of 23:00 on one day and 07:00 on the following day, from Monday to Sunday, including Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM 16.1, DM21.3.
61	**Site Condition Survey** Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.

	REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
62	**Demolition and Construction Management Plan** Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in

	accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
63	**Blue Badge Car Parking** One car parking space suitable for use by people with disabilities shall be provided on the premises in accordance with details shown in the plan No's 23747508-STR-HGN-ZZ-SK-D-PL401, 23747508-STR-HGN-ZZ-SK-D-PL402 and 23747508-STR-HGN-ZZ-SK-D-PL403 and shall be maintained throughout the life of the development and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
64	**Electric Vehicle** Minimum of one electric charging point must be provided within the delivery and servicing area and retained for the life of the building. REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16.
65	**Cycle Parking Facilities** Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the buildings sufficient to accommodate a minimum of 582 long stay spaces and 85 short stay spaces. All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. REASON: To ensure provision is made for cycle parking and that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy

	and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1, DM 16.3.
66	**Accessible cycle parking** A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24
67	**Changing Facilities and Showers** A minimum of 59 showers and 667 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3
68	**HVM** The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
69	**Unobstructed headroom on access ways** A clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways. REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
70	**Ancillary loading and unloading areas**

	All loading and unloading areas at basement levels must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto. REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
Air Quality	
71	**Generators** There shall be no installation of diesel generators to the building hereby approved. Reason**:** In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
72	**Filtration** Prior to occupation evidence that an appropriate NOx and Particulate filtration system has been installed as part of the ventilation strategy, and a detailed mechanism to secure maintenance of this system should be submitted and approved in writing. Reason: To ensure that future occupants of the proposed development are not subject to elevated levels of air pollution that have been predicted in the local ambient atmosphere.
73	**NRMM** Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. Reason**:** To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Fire	
74	**Fire Safety** The development shall be carried out in accordance with the approved details within the Fire Strategy: Fire Strategy, prepared by Semper dated January 2024. REASON: To ensure that the development incorporates the necessary fire safety measures
Use Classes	
75	**Offices** The areas shown on the approved drawings as Offices (Use class E(g)(i)) and as set out in Condition 78 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
76	**Flexible space** The areas shown on the approved drawings as flexible community/education/ cultural/sports/amenity and as set out in Condition 78 of this decision notice, shall be used for those purposes within Use Classes Class F2(b), F1(a)- (f)/ E (d), E(f) only and for no other purposes of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
77	**Terraces** The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces at all floors other than floor nine terrace at Holland House (Urban Farm), shall be used for Class E office use only and for no other purpose and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as

	amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
78	**Uses** The development shall provide (all figures GIA and excluding plant): - 34,584sq.m (GIA) of office floorspace (Use Class E(g)(i)), including 1,176sq affordable workspace; - 504sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b)); - 1,411sq.m (GIA) flexible community/ education/ cultural/ sports/ amenity (Class F2(b), F1(a)- (f)/ E (d), E(f)) uses; and - 4,794sq.m (GIA) of ancillary basement uses, including plant space, cycle storage space, shower facilities and building management, fire command centre, security room, refuse and storage and servicing areas; REASON: To ensure the development is carried out in accordance with the approved plans.
Approved Plans	
79	Approved Plans The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: - 4458-ST-EX-01-001 - 4458-ST-EX-01-002 - 4458-ST-DM-02-098 - 4458-ST-DM-02-099 - 4458-ST-DM-02-100 - 4458-ST-DM-02-101 - 4458-ST-DM-02-102 - 4458-ST-DM-02-103 - 4458-ST-DM-02-104 - 4458-ST-DM-02-105 - 4458-ST-DM-02-106 - 4458-ST-DM-02-107 - 4458-ST-DM-03-001

	- 4458-ST-DM-03-002 - 4458-ST-DM-03-003 - 4458-ST-DM-03-004 - 4458-ST-DM-03-005 - 4458-ST-DM-07-098 - 4458-ST-DM-07-099 - 4458-ST-DM-07-100 - 4458-ST-DM-07-101 - 4458-ST-DM-07-102 - 4458-ST-DM-07-103 - 4458-ST-DM-07-104 - 4458-ST-DM-07-105 - 4458-ST-DM-07-106 - 4458-ST-DM-07-107 - 4458-ST-DM-07-001 - 4458-ST-DM-07-002 - 4458-ST-DM-07-003 - 4458-ST-PR-01-001 - 4458-ST-PR-01-002 - 4458-ST-PR-02-096 - 4458-ST-PR-02-097 - 4458-ST-PR-02-098 - 4458-ST-PR-02-099 - 4458-ST-PR-02-100 - 4458-ST-PR-02-101 - 4458-ST-PR-02-102 - 4458-ST-PR-02-103 - 4458-ST-PR-02-104 - 4458-ST-PR-02-105 - 4458-ST-PR-02-106 - 4458-ST-PR-02-107 - 4458-ST-PR-02-108 - 4458-ST-PR-02-109 - 4458-ST-PR-02-110 - 4458-ST-PR-02-111 - 4458-ST-PR-02-121 - 4458-ST-PR-02-122 - 4458-ST-PR-02-123 - 4458-ST-PR-02-136 - 4458-ST-PR-02-137 - 4458-ST-PR-02-RF1 - 4458-ST-PR-02-RF2 - 4458-ST-PR-02-RF3 - 4458-ST-PR-02-RF4 - 4458-ST-PR-03-001 - 4458-ST-PR-03-002

	- 4458-ST-PR-03-003 - 4458-ST-PR-03-004 - 4458-ST-PR-03-005 A - 4458-ST-PR-03-006 A - 4458-ST-PR-03-007 A - 4458-ST-PR-03-010 A - 4458-ST-PR-03-011 A - 4458-ST-PR-04-103 - 4458-ST-PR-04-104 - 4458-ST-PR-04-105 - 4458-ST-PR-31-001 A - 4458-ST-PR-31-002 A REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Informatives

1. CAA Crane Notification

   Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

   The following details should be provided before the crane is erected:

   • the crane's precise location

   • an accurate maximum height

   • start and completion dates

2. CAA Building Notification

   If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 ‘Safeguarding of Aerodromes & Military Explosives Storage Areas’.

3. Thames Water

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

4. NPPF

In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

5. CIL

The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

6. Roof Gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

7. Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

8. Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

9. Design Team

The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4.

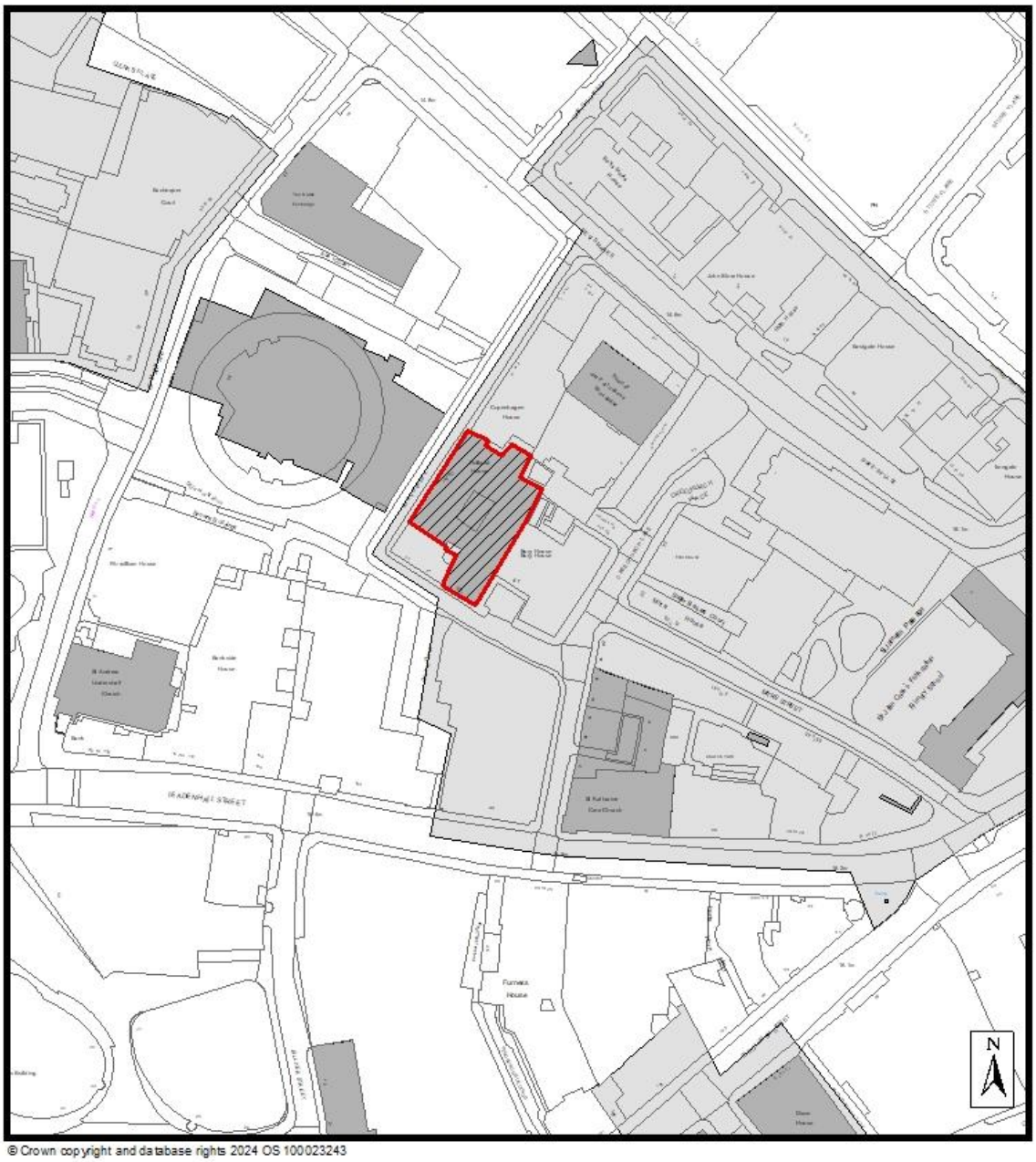
Committee	Date:
Planning Application Sub-Committee	13 December 2024
Subject: Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW 24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.	**Public**
Ward: Aldgate	**For Decision**
Registered No: 24/00011/LBC	**Registered on: 11 March 2024**
Conservation Area: Creechurch Conservation Area	**Listed Building: Grade II***

Recommendation

(1) That the Planning and Development Director be authorised to issue a decision notice granting Listed Building Consent for the above proposal in accordance with the details set out in the attached schedule subject to authorisation or a direction to do so being received from Historic England pursuant to Section 14 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Site Location Plan

Site Location Application Plan



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ADDRESS:
1-4, 32 Bury Street

CASE No.
24/00011/LBC

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Site Photos



Figure 1: View of Holland House from St Mary Axe plaza.



Figure 2: View of Holland House (southwest elevation) from Bury Street.



Figure 3: View of Holland House and Renown House from Bury Street.



Figure 4: Proposed development - View from Bury Street.

Main Report

Please refer to committee report for 24/00021/FULEIA

Background papers

Please refer to the background papers listed in the committee report for 24/00021/FULEIA

Appendix A

Relevant London Plan Policies

Policy HC1 Heritage conservation and growth

Emerging City Plan 2040

Draft Strategic Policy S11: Historic Environment

Draft Policy HE1: Managing Change to Historic Environment Development

Local Plan 2015 Policies

Relevant Local Plan Policies

CS12 Conserve or enhance heritage assets.

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

SCHEUDULE

Application: 24/00011/FULEIA
Holland House 1 - 4, 32 Bury Street London EC3A 5AW
Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

CONDITIONS

1	**Holland House and Bevis Marks Synagogue - Demolition and Construction Methodology and Structural Assessment** Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and long-term structural and non-structural implications for the listed buildings Holland House (Grade II*) and Bevis Marks Synagogue (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House and Bevis Marks Synagogue in accordance with the following policies of the Local Plan: CS12, DM12.1.
2	**Holland House – site meeting** Before work begins a site meeting shall be held between the local planning authority and the persons responsible for undertaking the works to ensure that the Conditions attached to the Listed Building Consent are understood and can be complied with in full. Notification of the date and time of a meeting shall be made in writing to the Local Planning Authority.

	REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
3	**Holland House - qualified professional specialising in conservation work** Before work begins it shall be agreed in writing with the Local Planning Authority the appropriately qualified professional specialising in conservation work who will supervise the hereby approved works of alteration or demolition. Any proposed changes to the agreed supervision arrangements shall be subject to the prior written agreement of the Local Planning Authority. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
4	**Holland House - ….** Before work begins the following shall be approved in writing by the Local Planning Authority. The work shall be carried out in full in accordance with approved details including: 1. Façade repairs and alterations a. Particulars and samples of materials to be used on all external faces of the building including external ground and upper level surfaces b. A method statement for cleaning and repair c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. Details of the reopening of the Bury Street entrance and other alterations 2. Repair works to the steel structure a. A condition survey of the existing historic structure b. A method statement for repair works c. A schedule of works and specification 3. Window Replacements a. Particulars and samples of the proposed windows b. A method statement for construction and installation c. A schedule of works and specification 4. Tenants entrance (west elevation) a. Particulars and samples of all materials and features b. A method statement for construction and installation 5. East Elevation (external wall) a. A condition survey of the historic fabric behind modern Portland stone b. Particulars and samples of proposed materials c. A method statement for construction and installation d. A schedule of works and specification 6. East Elevation (party wall with Bury House)

	a. Details of the interconnections between the listed building and the proposed tower floor levels, including alignment and connection of floor slabs and the new lift core 7. Internal works a. Details of works to the Heritage Lobbies including but not limited to any requisite repairs and particulars and samples of the materials thereof; b. Details of the works to the Atrium including but not limited to the junctions of the new floor slabs with the existing elevations, requisite repairs and particulars and samples of the materials thereof, and its presentation c. Details of works to the first floor Heritage Interiors, including but not limited to any repairs, minor alterations and works of re-presentation 8. South Elevation (party wall with Renown House) a. Details of the proposed extension of the floor slabs of the listed building behind, and their junctions with, the retained elevations of Renown House b. Details of the treatment of the retained sections of party wall between Renown House and Holland House 9. Rooftop additions a. Particulars and samples of materials to be used on all external faces of the building b. A method statement for demolition of existing upper level floors and construction of new structure and facades c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. External Lighting and landscaping at roof level 10. Details of junctions with adjoining buildings; 11. Details of the integration of window cleaning equipment, building maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level; 12. Details of ventilation and air-conditioning; 13. Details of external surfaces within the site boundary including hard and soft landscaping; REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
5	**Holland House – tilework replacement or repairs** Prior to practical completion, details of any other repairs and replacement tilework to the elevations resulting from further investigations shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details.

	REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
6	**Holland House – precautions to secure features during building work** Prior to practical completion, details of any other repairs and replacement tilework to the elevations resulting from further investigations shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
7	**Holland House - new works and finishes to match the existing** All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
8	**Holland House – Approved Plans** The works hereby permitted shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this consent: 4458-ST-DM-07-098 4458-ST-DM-07-099 4458-ST-DM-07-100 4458-ST-DM-07-101 4458-ST-DM-07-102 4458-ST-DM-07-103 4458-ST-DM-07-104 4458-ST-DM-07-105 4458-ST-DM-07-106 4458-ST-DM-07-107 4458-ST-DM-07-001 4458-ST-DM-07-002 4458-ST-DM-07-003 458-ST-PR-07-001 458-ST-PR-07-002 458-ST-PR-07-003

	458-ST-PR-07-004 458-ST-PR-07-005 458-ST-PR-07-006 458-ST-PR-07-007 458-ST-PR-07-008 4458-ST-PR-07-009 4458-ST-PR-07-010 4458-ST-PR-07-011 4458-ST-PR-07-012 4458-ST-PR-07-013 4458-ST-PR-07-014 4458-ST-PR-07-015 4458-ST-PR-07-016 4458-ST-PR-07-202 4458-ST-PR-07-203 4458-ST-PR-07-204 4458-ST-PR-07-205 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

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Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

28 November 2024

Dear Ms Tastsoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Follow-Up Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we write further to our previous letters dated 15 May 2024 and 15 November 2024, in relation to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

This letter accompanies two further documents supporting our client's objection to the proposals:

- An assessment of the impact on the Synagogue of the proposed development in Heritage/Townscape terms, prepared by Donald Insall Associates (Appendix 1); and
- A paper by Rabbi Shalom Morris providing further contextual detail on Bevis Marks Synagogue and its setting (Appendix 2).

This letter briefly summarises these additional documents and reiterates our client's objection to the proposed development.

Heritage/Townscape Impact Assessment

Donald Insall Associates has been instructed by The S&P Sephardi Community to prepare a professional third-party assessment of the heritage impacts of the proposals, particularly the impact of the proposed development on the significance of Bevis Marks Synagogue. The report finds that, in summary, the proposals for the Bury Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue.

Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well as its courtyard setting which frames the building and allows community and religious activities to take place.

The report concludes that the proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting.

Setting Study

Rabbi Shalom Morris has prepared a study of the setting of Bevis Marks Synagogue, with reference to its specific cultural and religious context and Jewish sources. The report draws on sources including Jewish religious law and the communal records kept at the Metropolitan Archives, alongside discussion of the community over time and how it operates today. Reflecting on these sources, the report explains the wide-ranging harm that the proposed tower would cause to the significance of the Synagogue, in terms of harm to:

- The original architectural intent of the Synagogue's design;
- Religiously important sky views;
- Interior light levels necessary for prayer;
- The purposeful functioning of the architecturally significant windows;
- The amenity of the communally important courtyard;
- The meaning of the Synagogue's name; and
- The economic viability of the site.

Summary

The documents enclosed further support our client's position that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.

We have previously set out the reasons for which the application should be refused; we repeat these here for emphasis. It remains clear the applications should be refused, for the following reasons (inter alia):

1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and the sensitivity of the Synagogue to changes in light levels.

2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused.

4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration.

5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use.

6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits.

7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it).

As planning officers of undoubted integrity, I trust you and your colleagues will recognise the above, and also that any attempt to justify recommending approval would be both improper and wide open to legal challenge.

Yours sincerely,

[redacted]

Roger Hepher
Executive Director

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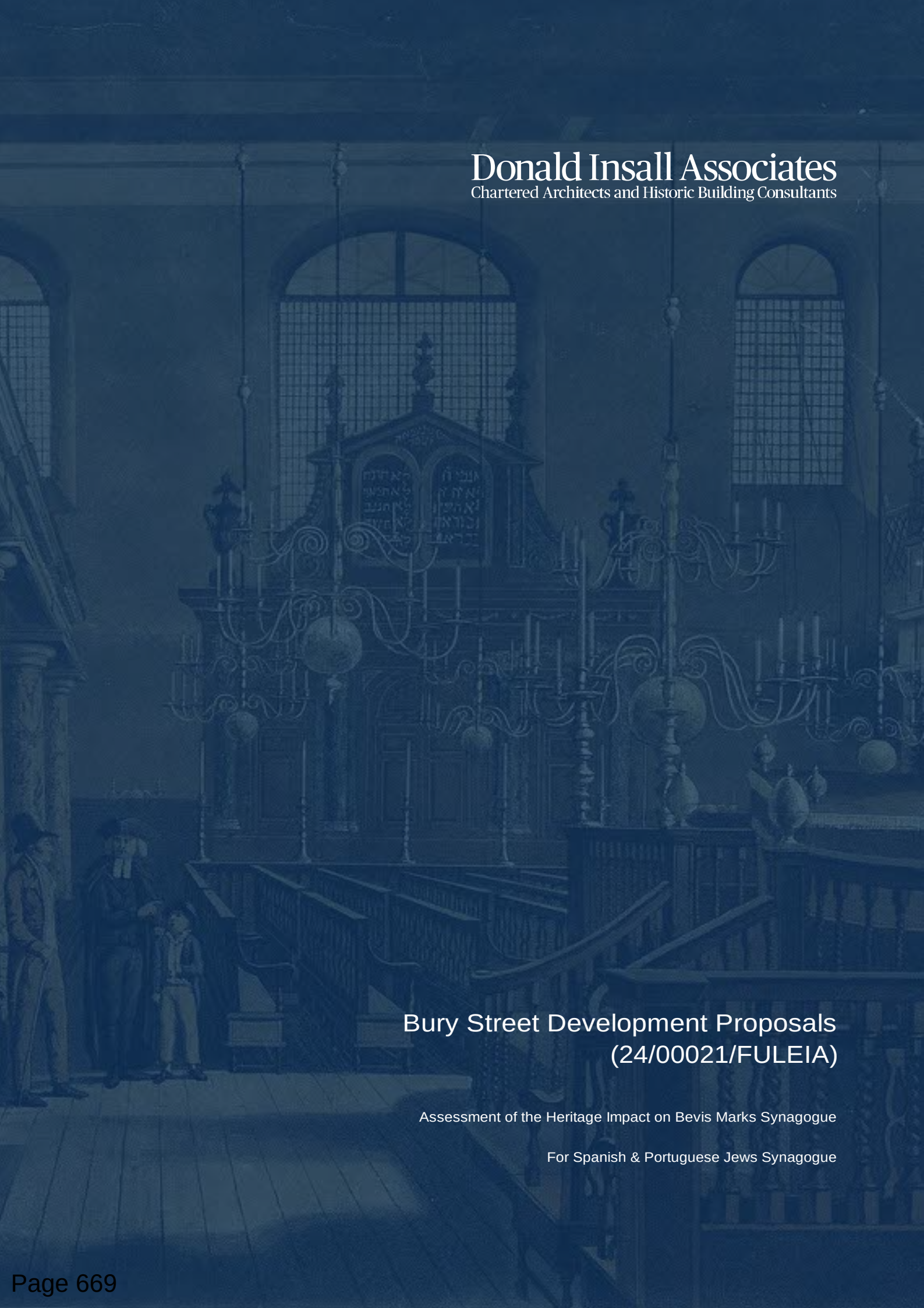
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Appendix 1 - Donald Insall Associates Heritage Assessment



Donald Insall Associates
Chartered Architects and Historic Building Consultants

Bury Street Development Proposals (24/00021/FULEIA)

Assessment of the Heritage Impact on Bevis Marks Synagogue

For Spanish & Portuguese Jews Synagogue

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1.0 Introduction

1.1 Background

Donald Insall Associates were commissioned by the Spanish & Portuguese Jews Synagogue in November 2024 to review proposals on land near Bevis Marks synagogue, namely for the demolition of Bury House and the erection of a new tall office building on the site (24/00021/FULEIA) submitted to the City of London Corporation on 8 January 2024. The proposals are currently under consideration. The site incorporates the Grade II*-listed Holland House and includes proposals for a four storey extension for this listed building (24/00011/LBC). These applications follow a scheme to replace Bury House (20/00848/FULEIA) that was refused on 22 June 2022 on the grounds of its adverse impact on the setting of Bevis Marks Synagogue and on the setting of the Tower of London World Heritage Site.

The proposed building on Bury Street is situated c. 25 metres to the south of the Grade I-listed Bevis Marks Synagogue and sits within the Creechurch Conservation Area [plate 1]. These heritage assets are protected by the law and national and local policy.

This short report is a professional third-party assessment of the heritage impacts of the proposals, particular the impact of the proposed development on the significance of Bevis Marks Synagogue.

The submitted applications are as follows:

24/00021/FULEIA 8 January 2024 Under Consideration

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

RE-CONSULTATION due to the submission of additional information and revised drawings

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

RE-CONSULTATION due to the submission of additional information and revised drawings

This report sets out: the history of Bevis Marks Synagogue (in Section 2), its significance (Section 3), provides an analysis of the Bury Street scheme proposals (Section 4) and outlines the impact of the Bury Street scheme on the significance of Bevis Marks Synagogue and the Creechurch Conservation Area (Section 5).

1.2 Summary of Findings

The report finds that, in summary, the proposals for the Bury Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue.

Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as '*the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting*'[1]. This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well as its courtyard setting which frames the building and allows community and religious activities to take place.

The proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the immediate setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting.

1 https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

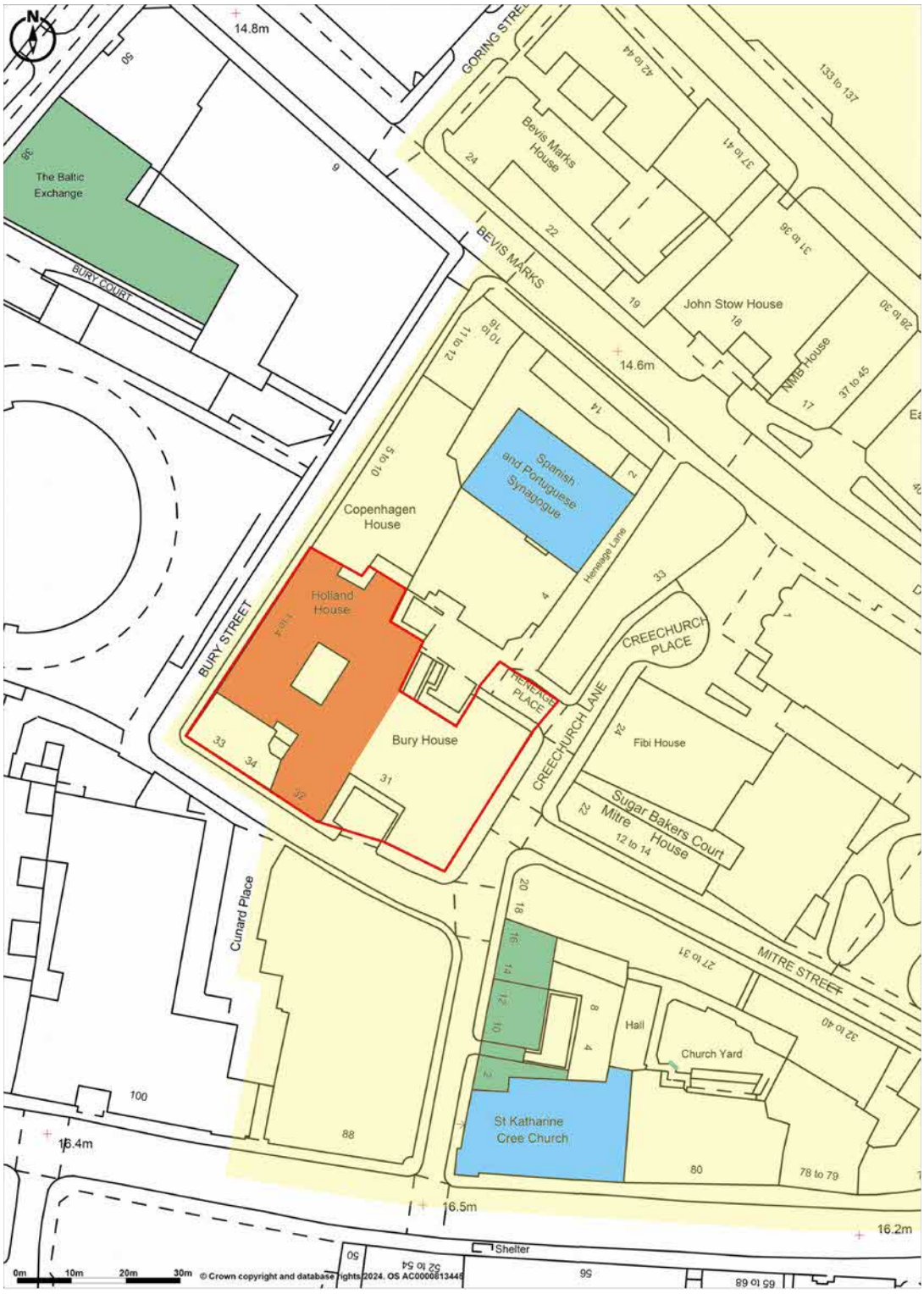


Plate 1

- Site plan of proposals under 24/00021/FULEIA
- Grade II listed
- Grade II* listed
- Grade I listed
- Creechurch Conservation Area

2.0 History of Bevis Marks Synagogue

Bevis Marks Synagogue was constructed in c. 1701 as the first purpose-built synagogue in London and followed the resettlement of Jewish communities in England in the late seventeenth century.

2.1 Re-admittance of Jews and Early Worship in Creechurch Lane

Jews were expelled from Britain in 1290 under an edict issued by Edward I. In the early seventeenth century, Jews from the Iberian peninsula (Spain and Portugal, known as 'Sephardi Jews') settled in the City having left Spain and Portugal in response to the Inquisition. Several came to England via Amsterdam, where they had also gone to escape persecution.[2] These were predominantly Jewish communities who had had to hide their religion in Spain, pretending to be Christian, and continued to do the same in England.[3] However, this community petitioned Oliver Cromwell –initially unsuccessfully –for official readmittance. A second petition, in c. 1656, appears to have received verbal assurance that 'they might meet privately for Jewish worship, acquire a burial-ground, trade as brokers on the Exchange, and enlarge their Community by bringing into England some more Sephardi (i.e. Spanish Jewish) merchants of good standing'.[4] It has been noted that this interview between Cromwell and the petitioners 'in effect, established the Jewish Community of England'.[5]

The Sephardi community first worshipped in a synagogue on Creechurch Lane, to the east of the present-day Bevis Marks Synagogue. This space was located in the upper floors of a pre-existing house and thus represented the ad hoc adaptation and alterations of a structure to the needs of the ever growing community.[6] In 1699, the Sephardi community acquired a 99-year lease of the present-day site of Bevis Marks Synagogue. The site was already occupied by a dense network of buildings fronting onto 'Berry Street', 'Beavis Lane' and Bevis Marks. These buildings backed onto a central courtyard with a central building accessed from alleys from the latter two streets, as can be seen in William Morgan's 1682 map [plate 2]. Under the terms of the lease, the community was permitted to demolish the existing buildings in order to construct a purpose-built synagogue along with, it appears, ancillary community buildings.

2 Sharman Kadish, *The Synagogues of Britain and London* (London: Yale University Press, 2011), 3.

3 Richard D. Barnett and Abraham Levy, *The Bevis Marks Synagogue* (Oxford: for the Society of Heshaim at University Press, 1970), 1-4.

4 Ibid.

5 Ibid.

6 Ibid., 5.



Plate 2 *Morgan Map of London, 1682 with the approximate location of the future Bevis Marks Synagogue marked and showing the tight urban grain which was demolished to make way for the Synagogue (Layers of London)*

2.2 Construction of the Synagogue

The synagogue was constructed between 1699 and 1701 under the supervision of Joseph Avis, a 'Christian master builder'.[7] Little is known about Avis and his precise role in the design of the synagogue remains obscure.[8] Avis is known to have been a 'Cittizen and Merchant Taylor of London' and worked on the Wren city church St Bride's Fleet Street, St James's Piccadilly and the Merchant Taylors' hall.[9] At the synagogue, Avis collaborated with several other craftsmen who had also worked on Wren churches and likely other City projects, situating the project within the broader building tradition of late seventeenth-century London in which the boundaries between architect, builder and craftsmen were blurred.[10]

The construction of the synagogue took place against the background of the increasing prosperity of the Sephardi Jewish community in London. Their ability to construct a purpose-built synagogue indicates the degree of social and economic security they had achieved by the late seventeenth century, giving them the funds and ability to commission a place of worship. The synagogue was built by a prosperous and growing community and within a society with fewer restrictions on Jewish worship following their readmittance to England. The choice of a builder within the establishment of British craftsmen connected to the Wren churches and broader rebuilding of the post-fire City and use of a fashionable, up-to-date architectural style demonstrates the ambition of their patronage. All of these factors mean, therefore, that Bevis Marks Synagogue can be taken in some ways as an ideal synagogue: one which was purpose-built with sufficient funds and one which could therefore respond to established Jewish law, religious practices and traditions, whilst also following current architectural practices in England.

2.3 Design of the Synagogue

While it is not within the scope of this study to delve extensively into the precedents of the architecture, much has been made of the stylistic affinities between Bevis Marks Synagogue and the Sephardi synagogue in Amsterdam, the *Esnoga*, which the Bevis Marks congregation was a daughter of and with which the early leaders of the community had close familial ties.[11] This synagogue has a comparable brick-faced exterior and equally substantial fenestration to illuminate the body of the synagogue which itself is set into a tightly built up townscape. The two synagogues also have similar internal arrangements, namely being accessed through a 'small panelled porch' that opens straight onto the prayer hall.[12] Equally, the synagogue has clear architectural affinities with the new city churches of Christopher Wren. However, it is also significant how the building responds to ideas about worship laid out in Jewish texts that would have guided those responsible for constructing the synagogue. This is dealt with extensively in Rabbi Morris' Objection Letter on Significance and

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7 The building contract for the site was signed on 12 February 1699, the foundation stone laid on 21 August 1700 and the Synagogue consecrated on 30 September 1701. Kadish, *The* Synagogues, 6-7. The attribution of the synagogue is discussed at length in the synagogue's CMP.

8 Ibid.

9 Ibid.

10 Ibid., 15.

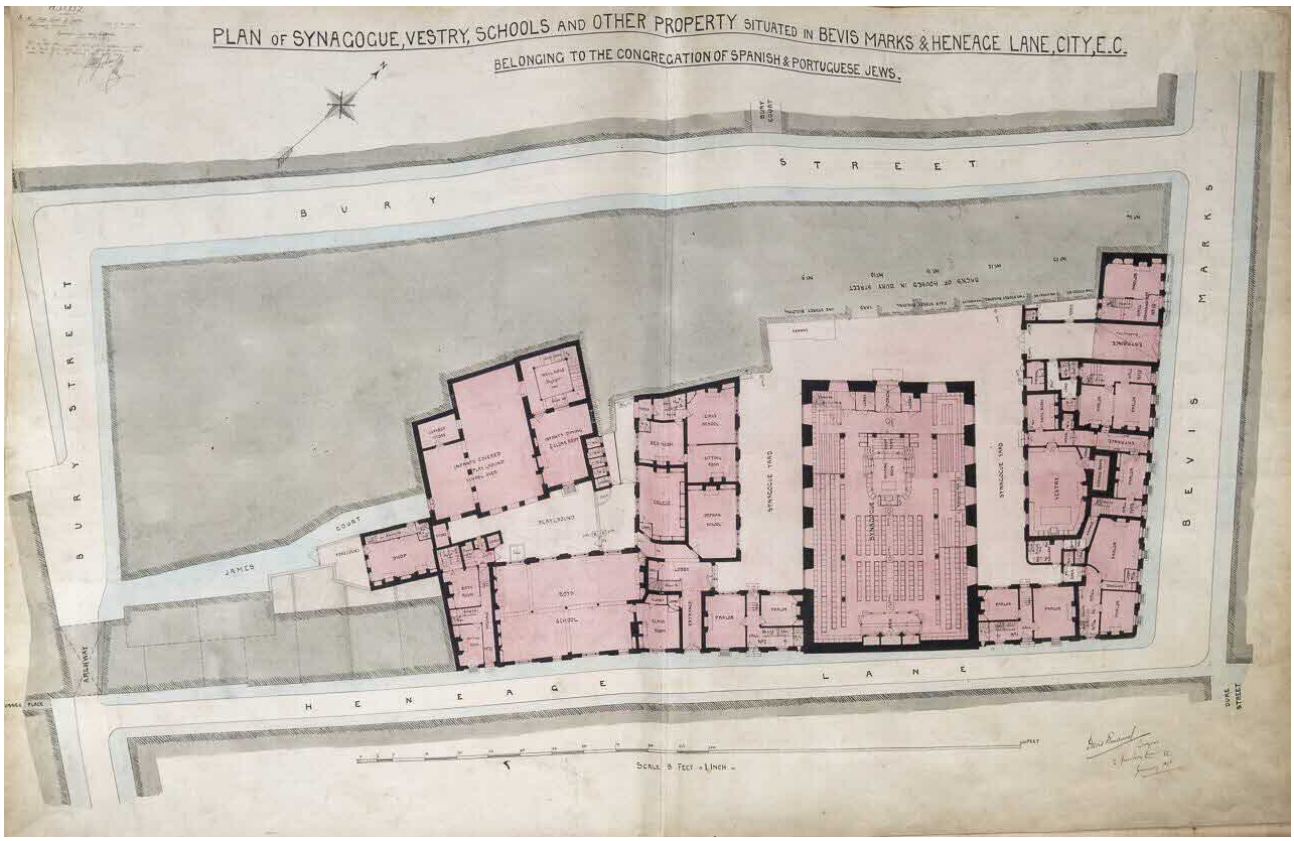
11 Ibid., 3.

12 Ibid., 11.

Rabbi Joseph Dweck's letter appended to the HGH report (15 May 2024), both available on the planning portal. For the purposes of our analysis three elements are most important and will be discussed in detail below:

1. The setting in a private courtyard, which provided
    a. An extension of the internal Synagogue space, where religious worship could happen such as prayers on the appearance of the new moon (Kiddush Levana) which require a view of the night sky
    b. A private space that acted as a buffer between the sacred space of the synagogue and the secular outer world, an effect which was augmented through the entry into the courtyard through a narrow arched passage which opened into a wider courtyard
2. The domination of the synagogue over surrounding buildings, which accorded with Jewish tradition that enshrined that the synagogue ought to be the tallest/most prominent building in a city
3. The provision of generous natural light to the interior and views to the outside world from the interior, which responded to the requirement in the Talmud that 'a person should pray only in a house with windows' (Berakhot 34b), a requirement that had both spiritual and functional objectives.

As originally constructed, the synagogue was situated in the centre of a courtyard and seems to have been originally –or at least from an early date –surrounded by low buildings that were used for other functions of the community such as almshouses, orphanages and schools. The earliest surviving plan of these community structures is from the late-nineteenth century [plate 3]. The plan shows the synagogue at the heart of a wider complex of physically and organisationally interlinked structures that supported the Sephardi community in different ways. The arrangement of the synagogue at the heart of a courtyard is first shown on John Rocque's 1746 Map, which shows the rectangular 'Jews Synagogue' accessed through a narrow alley from Bevis Marks which widened into a generous U-shaped courtyard that surrounded the synagogue to the north, west and south [plate 4]. This linked to a subsidiary space to the south which was accessed from Heneage Lane.



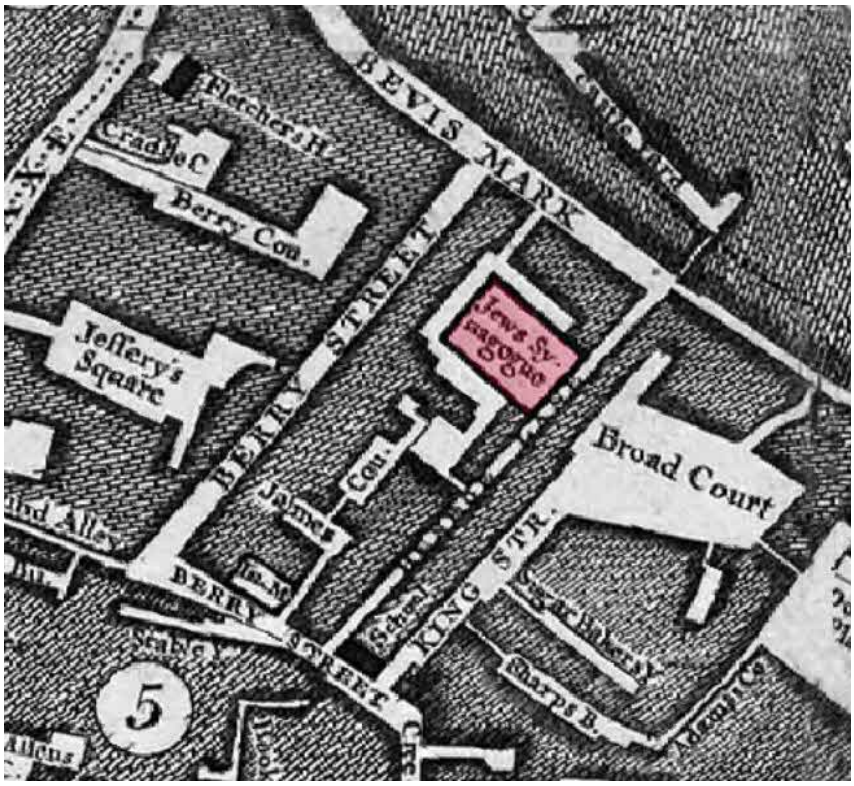


Plate 3 *Plan of Synagogue, Vestry Schools and Other Property Situated in Bevis Marks and Heneage Lane, City, E.C., belonging to the Congregation of Spanish & Portuguese Jews, 1876 (Bevis Marks Synagogue)*

Plate 4 *Rocque Map of London Westminster and Southwark, 1746. Note the presence of the U-shaped courtyard around the Synagogue (Layers of London)*

The courtyard appears to have always been considered a central space of the synagogue with early references to it being paved in free stone and a stone mason recorded as having paved the courtyard.[13] The explicit reference to the treatment of the courtyard in early documentation makes clear that this was conceived as part of the commission for the synagogue itself and was intended to be closely linked to the synagogue's architectural impact and religious function. Moreover, it has been noted that in typical synagogue architecture, a vestibule separates the street from the prayer hall. In the Sephardic tradition, however, the vestibule did not develop as part of the building typology, in part following the model of the Esnoga, the Sephardi synagogue in Amsterdam.[14] In these buildings 'the lack of vestibule' is compensated for 'by the existence of a courtyard'; hence, the courtyard was seen as an extension of the building itself.[15] While it has been suggested that the location of the synagogue within the courtyard was because of restrictions placed on the construction of synagogues on high streets, its position clearly had significance for the liturgical function of the building itself.[16]

This arrangement –of the synagogue in a courtyard surrounded by community buildings –was maintained throughout the eighteenth and nineteenth centuries and is shown on the Goad map of 1887. This shows how the synagogue related to neighbouring buildings and highlights that, despite the presence of larger warehouses to the synagogue's west, many of the surrounding structures were still low-rise [plate 5].



Plate 5 *Goad Map, 1887. Note that several surrounding buildings were still in use by the Sephardic Community and that most buildings were still of a modest scale (Layers of London)*

13 Ibid., 6.

14 Ibid., 10-12.

15 Ibid.

16 Ibid., 5.

The exterior of the synagogue is shown in a contemporary print which shows the synagogue rising above the surrounding buildings [plate 6]. The view in the print shows the building from the northeast, the angle that the visitor or worshipper first perceives when entering the private courtyard through the arched entrance on the public street, Bevis Marks. From this angle, the building clearly was intended to dominate over its surrounding structures.

The form of the building itself was informed by the religious needs of the community. It was dominated on the interior and exterior by large multi-pane windows. On the north and south elevations, there were smaller windows that lit the ground floor and larger round headed windows at the level of the internal gallery. Windows on the eastern side were elevated above the Arc and on the western side, above the entrance porch. Early images emphasise that the space was configured to be flooded with light, which served both spiritual purposes and functional purposes as it provided light for people to read prayers. These images include an early nineteenth-century print which shows the play of light and shadow across the floor [plate 7], an 1884 watercolour that shows the even lighting achieved due to the generous windows on all sides [plate 8] and a late nineteenth-century print which literally renders the beams of light emanating from above through the southern windows, casting light onto the Arc and seats which would house the congregation during services [plate 9]. The images make clear, as is still the case in the synagogue today, that the space was dominated by these large, clear windows. Besides the light from the windows, the interior was historically lit by seven chandeliers. These chandeliers are, today, fairly inaccessible and take an hour to light and an hour to extinguish by hand. It could be presumed that they were predominantly used at night and that the interior was light enough for worship during the day without the aid of artificial light.

Not only was the provision of light important, views of the outside world were also important in Jewish worship. As is outlined in Rabbi Morris' report on the setting of the synagogue, also available on the planning portal, views of the outside were significant because of the importance of knowing the time of day, traditionally understood through views of the sun and night sky, to instigating Jewish prayer. In particular, the appearance of stars in the night sky traditionally was used to demarcate the end of the Sabbath, whilst the passage of the sun in the daytime was used to indicate times for prayer and worship. The large and multiple windows in the synagogue, then, both permitted views to the outside world that permitted the demarcation of the passage of time and thus the call to prayer as well as serving a functional purpose of lighting the interior.

While elements of the fabric of the interior and exterior have been renewed –namely the pane glass and the paving to the courtyard –the overall configuration of the building envelope and much of the courtyard have remained the same, reflecting the enduring use by the same community of Sephardi Jews who built the synagogue over 300 years ago.[17]

17 The Synagogue's Conservation Management Plan discusses alterations in detail.



Plate 6 *View of Bevis Marks Synagogue from the northwest in 1891, showing the Synagogue's original setting in an open courtyard with low ancillary buildings to its south and east (Bevis Marks Synagogue)*



Plate 7 *Print after Belisario of the interior of Bevis Marks Synagogue showing two visitors. Note the play of light on the floor (MeisterDrucke)*

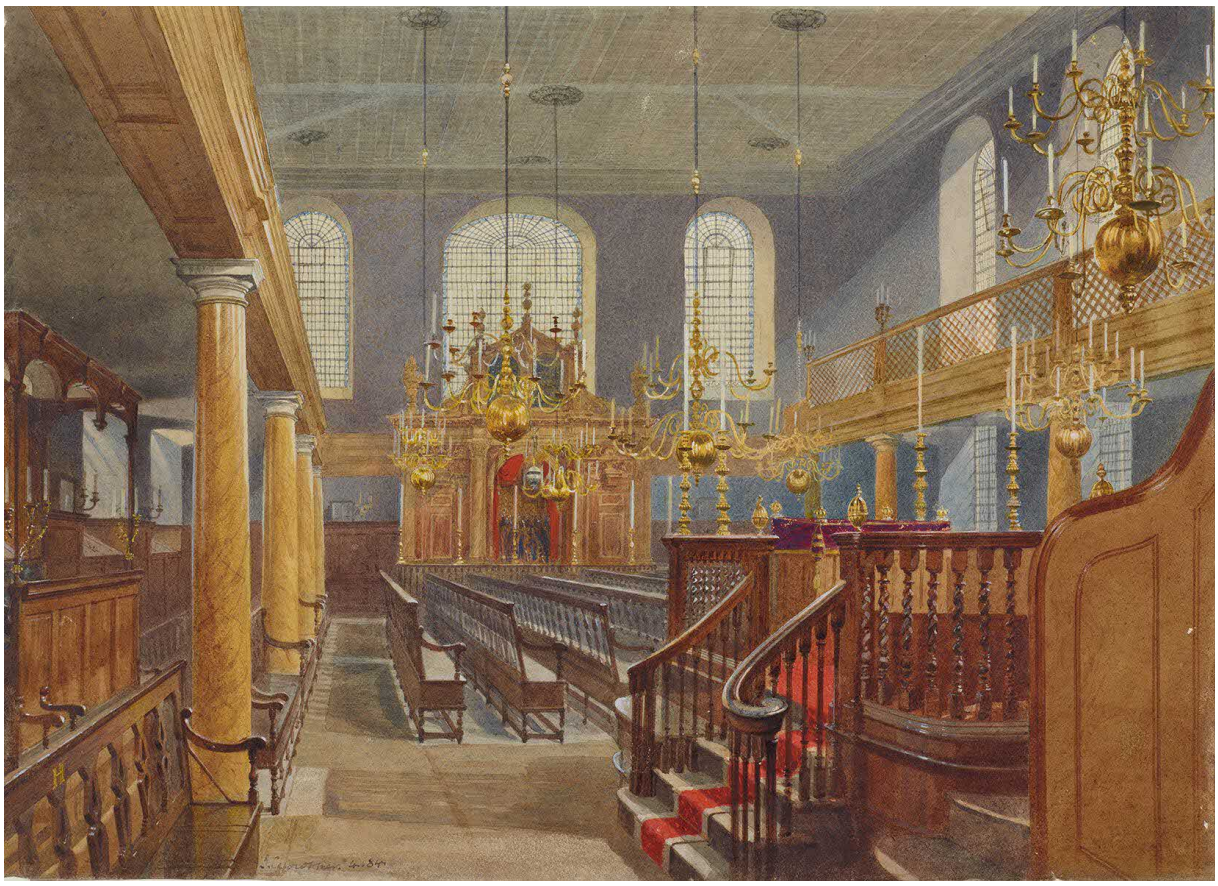


Plate 8 *Watercolour of the interior of Bevis Marks Synagogue, 1884. Note the even light cast through the windows and the importance of the bright light coming through the windows to the appearance of the space (LPA)*

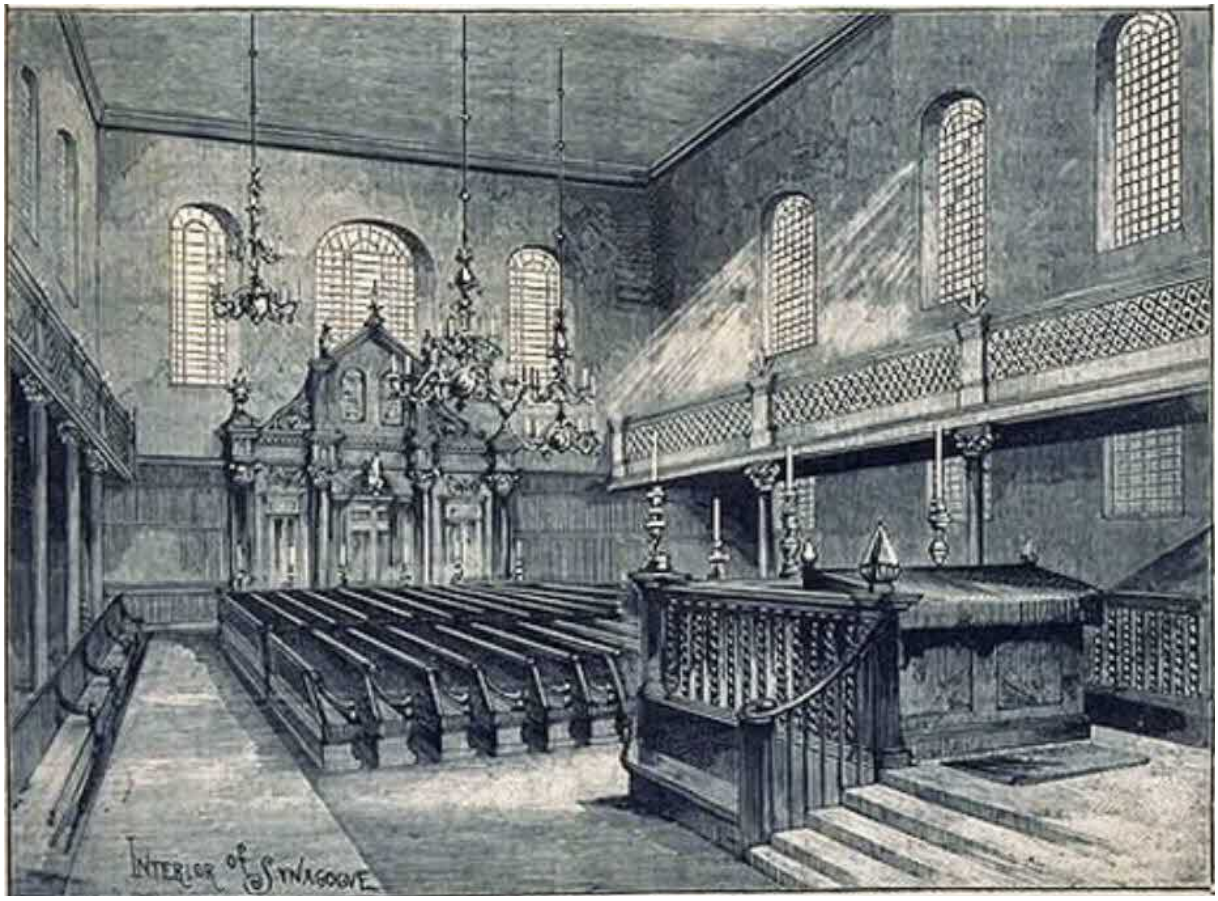


Plate 9 *Print of the interior of Bevis Marks Synagogue in 1891, with emphasis placed on light streaming in through the southern windows (Bevis Marks Synagogue)*

2.4 Later Changes to the Synagogue's Setting

The wider setting of the synagogue has evolved, firstly in the late nineteenth century when it itself was threatened by demolition in 1886.[18] This ultimately led to the demolition of some of the surrounding buildings and their replacement with new structures, such as the houses and offices that flank the synagogue on its eastern side and open onto Heneage Lane. Comparison of the OS Town Plan from 1896 [plate 10] and that from 1916 [plate 11] shows the infilling of the open space to the rear of some of the buildings to the west of the synagogue thus creating a solid wall to the south of the synagogue as well as broader redevelopment in the area such as the replacement of small blocks on Bury Street with the larger Holland House.

The setting has continued to evolve through piecemeal redevelopment of neighbouring plots over the course of the twentieth and twenty first centuries. Except for the Victorian buildings that flank the synagogue on the eastern side, the courtyard is now entirely surrounded by relatively modern buildings. However, these buildings remain of a fairly modest scale, despite being taller than the synagogue. This means that they still permit views to the sky and do not feel overbearing. It is notable that the buildings that form the southern side of the courtyard seem to have been intentionally designed to respond to the height of the synagogue [plate 12]. While both are taller than the synagogue, they have clearly delineated lower storeys and mansard roofs. The cornice line of the lower storeys is similar to the height of the synagogue, especially when seen from an oblique angle, and the mansard roofs are sloped away from the synagogue, thereby allowing the synagogue to still feel as if it is the dominant building in the courtyard. To the immediate south of the synagogue, the courtyard was infilled in the twentieth century with a glazed structure which has since been replaced with a single-storey visitors' centre and museum for the synagogue, due to be completed in 2025.

In the wider settings, there are tall buildings to the south constructed in recent years which are visible from the courtyard. These include 40 Leadenhall and 52-54 Lime Street. Because they are further from the site than the proposed Bury Street tall building, their impact on its setting is more limited and there is still sky seen between them and a sense of distance maintained between these buildings and the courtyard. There are also modern tall buildings to the east and west of the synagogue.

So, in summary, the synagogue represents a purpose-built religious building that articulated the aspirations of the burgeoning Sephardi Jewish community in the late seventeenth and early eighteenth centuries and which can be understood as an ideal synagogue structure due to its correlation to statute in Jewish texts. The form of the synagogue and courtyard were fundamentally related to its use as a synagogue in the period of its construction and in the subsequent centuries to the present day, and its open courtyard with sky views forms an intrinsic part of the significance of the synagogue, both spatially and functionally.

18 Barnett and Levy, *The Bevis Marks Synagogue*, 9.

3.0 Assessment of Significance of Bevis Marks Synagogue and its Setting

3.1 Policy Context

The purpose of this section is to provide an assessment of significance of Bevis Marks Synagogue in order to evaluate the impact of the proposals for a new tall building on Bury Street on that significance in section 5.

This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as:

> '*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*'.

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment. It provides relevant guidance as to how to assess the significance and setting of a heritage asset. On significance the PPG says:

Paragraph 6: What is "significance"?

'*Significance*' *in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- ***archaeological interest****: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- ***architectural and artistic interest****: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*

- ***historic interest****: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

And on setting:

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

3.2 Assessment of Significance of Bevis Marks Synagogue

Bevis Marks Synagogue is a Grade I-listed building located within the Creechurch Conservation Area. It was constructed between 1699 and 1701 as the first purpose-built synagogue of the Sephardi Jewish community in England and has been in continuous use as a synagogue by the community since. The building is rectangular and constructed of brick, with generous multi-paned windows on all four sides, informed by the church architecture of Sir Christopher Wren and the architecture of the Sephardi *Esnoga* in Amsterdam which had strong links to the London Sephardi community in the seventeenth century. It is situated within a courtyard accessed from Bevis Marks and its rear elevation fronts onto Heneage Lane.

As a Grade I-listed building, Bevis Marks Synagogue has been recognised to have an **exceptional**[19] **degree of architectural and historical interest and significance**. Its historical interest lies in its status as the oldest purpose-built synagogue in Britain in continuous use. The building's historical and architectural interests are closely intertwined. As discussed in section 2, there are three elements of the synagogue that were likely informed by the functional and liturgical needs of the congregation, when first constructed, namely:

- its setting within a private, open courtyard with sky views which formed a spatial and functional extension to the interior of the synagogue,
- the domination of the synagogue over its surroundings,
- and the provision of ample natural light to the interior which had liturgical and functional importance.

These needs dictated the form that the building took and its situation in a generous courtyard. Internally, the provision of large multi-paned clear plate glass windows, opening onto the courtyard and unobstructed by surrounding buildings, defined the spatial quality of interior, making it feel like a light, open space connected to the outside world. These elements related closely to the historical uses of the building.

The building survives largely intact both internally and externally, with these key features still well-represented, if somewhat obscured by encroaching development. Whilst there have been alterations, such as the introduction of some artificial light in the 1920s, likely in part to alleviate the task of lighting and extinguishing the chandeliers which takes several hours, the configuration of the structure has remained legible. As such, the original function of the building is manifest in its fabric and form and this allows us to understand how the space was used historically. Hence, architectural and historic significance of the building is **exceptional** as it illustrates how Sephardi Jewish communities have worshipped in Britain for the past 300 years in a building of high quality.

Moreover, the building remains in use by the community for whom it was constructed and this continuing use by the Spanish and Portuguese Sephardi Jewish community forms an inherent part of its significance. Historic England, the government's statutory advisor for heritage matters, provides guidance on how such elements of significance should be assessed in *Conservation Principles* (2008). It describes 'communal

19 Definitions of statutory listing grades are provided here: https://assets.publishing.service.gov.uk/media/5beef3c9e5274a2b0b4267e0/Revised_Principles_of_Selection_2018.pdf

value' as a tool for assessing significance, which includes social value ('associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence') and spiritual value which is defined as:

> *59. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.*
> *60. Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.*

In the case of Bevis Marks Synagogue, these criteria are central to understanding the significance of the building. The building's exceptional special interest and significance resides primarily in its status as the UK's oldest synagogue, the UK's first purpose-built synagogue and its continuing use as a synagogue for the same community who built it, those for whom it has social, communal and spiritual value. The contribution of the **use** of the building to its significance, then, is of **exceptional** importance. The enduring relationship between the fabric of the building and the functioning of the community is essential to its significance.

The building's **setting**, in particular, its courtyard, but also its wider setting visible from the building and the courtyard, make a **very strong contribution** to its significance and speak to the building's historic function, architectural interest and present-day use. The courtyard outside the building has been its setting since it was constructed and it seems evident that it was specifically conceived to have functional and liturgical purposes. The building's setting in this enclosed courtyard maintains the historic setting of the building and therefore contributes strongly to its **historic and architectural interest.** The courtyard afforded the synagogue a high degree of privacy, which was important to its historic use.

Not only is the courtyard the space from which the synagogue is meant to be seen, it also was conceived to ensure the provision of light into the interior of the synagogue and to form an external extension of the building in which services could take place. These services and the provision of light were predicated on the relationship to the broader setting. This is recognised to be an element of setting protected by the law, as explained in NPPG (2019), which states that '*the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*' Environmental factors can be taken to include light and landscape, which includes the sky, and, in the case of the synagogue, these are factors that contribute strongly to the building's significance. The relationship between the building and its surrounding environment, namely retained sky views which have liturgical and functional importance, are an important part of its significance. That these were recognised by the original community who used the synagogue is perhaps made evident by the synagogue's name, 'the Gate of Heaven', which could be taken symbolically to gesture towards the relationship between the building

and the sky above The importance of this sky view for the practising community today is paramount, because the courtyard is a space of arrival, prayer and community gatherings. While the synagogue's setting has been negatively impacted by the construction of towers to its south and west, it still retains a sense of open-ness, in large part because these towers are set back from the site and do not dominate its setting.

The synagogue's setting, then, is defined by both its physical relationship to its historic courtyard and immediate surrounding low-rise buildings, but also by its relationship to its broader environment which includes elements of the natural environment experienced by the viewer and worshipper on site, including the sky views and natural light.

It should be noted that the draft City of London Local Plan 2040, currently under inspection, has attempted to define the 'immediate setting' of Bevis Marks synagogue in a policy map (figure 27). The synagogue's 'immediate setting' is referenced in Strategic Policy S21: City Cluster and Policy HE1:Managing Change in the Historic Environment. The Plan identifies solely the blocks immediately abutting the synagogue's courtyard as the 'immediate setting' of the building (thereby excluding Bury House and the sites of other towers to the south of the Synagogue). This assessment has already been challenged by Historic England as well as the synagogue and it is important to note that the wider setting, not just the buildings abutting a listed building, is considered part of the setting of a building as assessed in policy.[20]

In summary, the building is of **exceptional national significance**, significance which is derived from **architectural and historical interest, communal value** and **the building's setting.**

20 Historic England's comments on the 'immediate setting' proposal contained in HE1 and S21 are in LD8 Consultation Statement Appendix 9 (https://www.cityoflondon.gov.uk/assets/Services-Environment/LD8-Appendix-9-City-Plan-2040-Regulation-19-Consultation-Responses.xlsx).

4.0 Bury Street Proposals

The proposals contained within application 24/00021/FULEIA cover the site of Bury House, Holland House and Renown House, located between Bury Street to the west, Bury Street to the south, Creechurch Lane to the east and Valiant House to the north. The proposals, designed by Stiff + Trevillion, seek to demolish Bury House, a post-war office building, and replace it with a new tall building which would consist of 4 basement levels, ground floor and 43 storeys. It is proposed that the new tall building which would have facades comprised of rows of rectangular windows and be clad in terracotta tiles between the PPC glazed windows. The site of the new tall buildings is about 25 metres to the south of Bevis Marks Synagogue.

The proposals also seek to make alterations to Holland House and Renown House which involve partial demolition and the construction of extensions. For the Grade II*-listed Holland House, which is also subject to a listed building consent application (24/00011/LBC), it is proposed to *inter alia* add a four-storey extension. This restoration includes the 'removal and reinstatement of external faience', reopening a historic entrance on Bury and, in part, also refers to internal demolition which is proposed of features identified as later alterations, as well as the removal of other modern interventions. Demolition to facilitate interconnection between the three buildings is also proposed as well as other internal alterations. A three-storey extension is proposed for Renown House which is an unlisted historic building.

The project's Design and Access Statement summarises the benefits proposed by this scheme. These include: the provision of a floor of affordable workspace in Holland House, the creation of routes including the extension of Heneage Lane, creation of further active frontage, and new public space, and heritage benefits which entail the repair and restoration of Holland House and the unlisted Renown House. The DAS additionally highlights the sustainability, biodiversity, delivery and transportation, SME and economic provisions of the project.

5.0 Impact of the Bury Street proposals on the significance of Bevis Marks Synagogue, its setting and the Creechurch Conservation Area

5.1 Impact of the Proposals on the Significance of Bevis Marks Synagogue

The proposed scheme for the construction of a 43-storey tall building on Bury Street would have an adverse impact on the significance, including setting, of the Bevis Marks Synagogue.

Several grounds for heritage objections to the scheme have been raised by Historic England and other statutory bodies and other objectors. The report produced by Alex Forshaw and appended to HGH's objection letter outlines the impact of the scheme on the setting and significance of various designated and non-designated heritage assets, including, notably the Grade II*-listed Holland House to which proposed extensions would cause harm. We concur that the proposals for a 4-storey extension to Holland House would create harm to its significance because of the considerable extent of the proposed roof extension set above the building's fine street frontage.

This report deals primarily with the impact on the setting of Bevis Marks Synagogue and how this impact would affect the significance of Bevis Marks Synagogue.

As identified in section 3, the synagogue's significance lies in its exceptional historic and architectural special interest as the first purpose-built synagogue in Britain and one which is largely still intact and thus reflects the historic worship practices of the Congregation, in its continued use by the community and in its setting which was central to the functional and liturgical uses of the building historically and in the present day. As we identified in section 3, in accordance with the NPPG, the setting of the synagogue is not formed solely by the buildings immediately abutting its courtyard, but rather encompasses a wider environment which includes the light conditions and views to the sky and the moon, currently present on the site. The HTVIA provided by the applicant incorrectly identifies the setting as limited to the courtyard, writing that *'the contribution that setting makes to the heritage significance of Bevis Marks Synagogue is very localized, and the wider setting, beyond Heneage Lane and the courtyard, where the Site lies, does not contribute to this significance.'* This assessment does not take into account all available information about how the setting relates to the building's use and significance.

Indeed, the assessment of the setting provided in the refusal of the previous application for a tall building on the site –which was not substantially different to the current proposal –acknowledged that the building's setting is wider than the immediate courtyard. The refusal letter states:

1. *The development would adversely affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue*.

In the case of this application, the proposed benefits did not outweigh the public benefits of the proposals and thus ran contract to Local Plan and London Plan policies. So, it has been previously acknowledged that the setting contributes to the significance of the building, as we have also found in this report.

The proposed scheme would impact on the historic and architectural significance of the synagogue, its setting and its use, principally through overshadowing. The new tall building would:

1. Impact the setting of the synagogue which was historically characterised as open to the sky, a characteristic which has survived, albeit in slightly lesser form due to some new, taller buildings in the vicinity, to the present day. The openness to the sky is important to the courtyard as it communicates that it was intended to be a space of worship, particularly in relation to the moon (and would therefore be harmed by the tall building blocking views of the moon), and a space for communal gatherings which would be compromised by the additional overlooking and the overbearing character of a very tall building in close proximity;
2. Provide a new backdrop to the synagogue and harm its architectural interest, as tall building would be very close and out of scale to the buildings fronting the courtyard and the synagogue itself, as the synagogue was intended to be dominant in its setting, responding to Jewish religious law;
3. Impact the provision of natural light and views to the sky from inside the synagogue which may compromise the continued use of the synagogue by its community and would reduce the building's functionality by reducing the usable space.

These amount, cumulatively, to serious harm to the heritage asset's significance.

National legislation and policy impose duties upon local planning authorities to consider the impacts of proposals upon listed buildings and conservation areas.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision making on applications that relate to the historic environment. Section 66 of the Act imposes a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their settings. It states that:

> *In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

The National Planning Policy Framework (NPPF) (December 2023) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF requires that, with regards to the significance of a heritage asset:

> *201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

Local planning authorities are required to take into account '*the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*' (paragraph 203) in determining applications. Should a proposal cause harm to the significance of a designated heritage asset, the Local Planning Authority is required to give '*great weight*' to '*the asset's conservation (and the more important the asset, the greater the weight should be)*' (paragraph 205). The NPPF continues to note that harm to a designated heritage asset must be justified:

> '*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.*' (paragraph 206).

So, national legislation and policy requires that decision makers consider the impact of proposals on the significance of surrounding heritage assets; it is evident that the impact of the Bury Street proposals on the Grade I-listed Bevis Marks Synagogue's architectural and historic significance through the impacts on its setting, therefore, must be considered fully by the City of London Corporation and inform the determination of the application.

There is genuine concern amongst the community that uses Bevis Marks Synagogue that the harm to the setting and interior of the synagogue that would be caused by the approval of this tall building could lead to the synagogue no longer being a suitable and functional space of worship, as certain rituals could not be performed, such as the prayer said to the waxing moon, and as parts of the interior would be plunged into darkness, making difficult or even preventing their use by the Congregation. Were the Congregation to leave the synagogue, this would impact greatly the significance of the structure, which, as we have discussed above, is closely tied to its status as the oldest purpose-built synagogue in the UK and its continued use by the Sephardi community. In turn, the long term conservation of the building would be put at risk. These are impacts to the listed building that the City Corporation should also take into consideration when determining this application.

As discussed above, legislation and national policy requires that Local Planning Authorities take into consideration the impact of proposals on the significance and setting of heritage assets. Local and Neighbourhood Plans are the means through which Local Planning Authorities articulate how they will apply national policy to local situations and refine the requirements put in place by central government. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The London Plan (March 2021) and City of London Local Plan (January 2015) have policies which are relevant to the issues at hand.

The London Plan's Policy HC1 Heritage conservation and growth requires that

> '*(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process'.*

Also relevant to the proposals is the London Plan's Policy D9 Tall buildings which states that

> '*(d) proposals [for tall buildings] should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.*

The City of London's Plan (January 2015) similarly protects the setting and significance of heritage assets.
Core Strategy Policy CS12: Historic Environment states the need

> '*to conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors, by:*
>
> 1. *Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses [..]'*

Policy DM 12.1 relates to the need to manage change affecting all heritage assets and spaces and states the desire

1. *To sustain and enhance heritage assets, their settings and significance.*
2. *Development proposals [..] that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development [..].*
3. *[..]*
4. *Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.'*

It is essential, then, that the decision makers, in line with national and local policies, evaluate the impact that the proposals for the tall building on Bury Street would have on the setting and, in turn, the significance of Bevis Marks Synagogue.

Based on our analysis, we believe that these proposals would cause serious harm to the Grade I listed heritage asset, and therefore, require that the harm be outweighed by the public benefits put forward by the scheme. The public benefits of the scheme, however, in our view fall short of outweighing the serious harm to the synagogue.

Following the NPPF, 'great weight' must be given to the conservation of the Grade I listed building. These proposals would fail to do so. Instead, they would adversely impact the setting and its contribution to the significance of the synagogue, and cause harm the architectural and historical interest of the building, and thus the proposals, as they stand, threaten the building's conservation.

5.2 Impact of the Proposals on the Creechurch Conservation Area

The proposed development would also impact the character and appearance of the Creechurch Conservation Area which was designated in 2024. The Conservation Area Character Summary and Management Strategy is currently under preparation by the City Corporation.[21]

The area is characterised by predominantly mid-rise buildings and is dominated by historic buildings and street patterns; the Creechurch Conservation Area Proposal identifies, in particular, the late nineteenth century warehouses on Creechurch Lane and Mitre Street, the Edwardian Aldgate School, the three religious buildings (most importantly Bevis Marks Synagogue) and several open spaces as defining the area's character and appearance, which is also notable for its association with the history of Jewish communities in Britain.

The legislation and policy discussed above also have requirements for the decision makers when dealing with development within conservation areas.

Section 72(I) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

> *[..] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.*

A Conservation Area constitutes a designated heritage asset in its own right and therefore the policies discussed above in the NPPF are also relevant here and the Local Planning Authority must give '*great weight*' to '*the asset's conservation*'.

However, the NPPF does also state in paragraph 213 that:

> *Not all elements of a Conservation Area or World Heritage Site 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 or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

Hence the loss of Bury House, which does not contribute to the Conservation Area, is not in itself problematic. However, the impact of the replacement building is.

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21 Creechurch Conservation Area - City of London

The City of London Local Plan (January 2015) states in Policy DM 12.2 Development in conservation areas that *'1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.'*

In Core Strategic Policy CS14: Tall Buildings the conditions in which a tall building will be acceptable or unacceptable are stated:

> '*To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhancing the skyline and provide a high quality public realm at ground level, by:*
>
> 1. *Permitting tall buildings on suitable sites within the City's Eastern Cluster.*
> 2. *Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and monument views and setting, as defined on the Policies Map.*
> 3. *Elsewhere in the City, planning proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of the heritage assets and their settings; and the effect on historic skyline features.*'

While the site of Bury House is located within the City's Eastern Cluster, the site is clearly not a 'suitable' one due to its proximity to Bevis Marks Synagogue and the impact of the proposals on its setting and significance. Moreover, the policy explicitly states that planning permission will be refused in conservation areas making this a doubly inappropriate site for the construction of a tall building.

The draft City Plan 2040 is being prepared for examination by the Planning Inspector on behalf of the Secretary of State. The Draft Plan's Strategic Policy S12: Tall Buildings removes the presumption of refusal for tall buildings in Conservation Areas, though there remains the requirement that *'8. Tall buildings must have regard to: [..] c. the significance of heritage assets and their immediate and wider settings.'* This policy remains in draft and has attracted significant objection from inter alia Historic England. Therefore, the current Plan's policy against tall buildings in conservation areas must be followed, which would require this application to be refused. However, even if one applied the draft policy to which little weight can be attached at present, it seems evident that the proposed building does not have due regard to the significance of the Grade I listed Bevis Marks Synagogue.

5.3 Conclusion

In summary, we find the proposals for the construction of a 43-storey tall building to replace Bury House cause serious harm to the exceptional special interest of the Grade I-listed Bevis Marks Synagogue. The NPPF requires that 'great weight' is given by decision makers to the conservation of the Grade I listed building, and that schemes that would cause harm to such a structure could only be granted consent in the situation in which clear and convincing justification has been provided, and where public benefits outweigh such harm. In the case of the impact on the synagogue, the heritage harm is serious, and would affect both the immediate and long term functioning of the synagogue, and may compromise the future use of the building which is an important part of its significance. The proposals do not show evidence of having given great weight to the conservation of the significance of Bevis Marks, nor do they appear justified, or outweighed by public benefits, and therefore do not apparently accord with the heritage policies set down in the NPPF, nor those in the local plan which in its current iteration does not allow for tall buildings in conservation areas. These concerns are also set out in Historic England's response to the current application, and mirrored in many objections to the scheme.

It is our professional view that the proposals fall short of the national and local policy requirements for designated heritage assets.

Synagogue, Bevis Marks EC3

Heritage Category: Listed Building
Grade: I
List Entry Number: 1064745
Date first listed: 04-Jan-1950
Date of most recent amendment: 10-Nov-1977

Details
BEVIS MARKS EC3 1. 5002 (South Side) Synagogue (Formerly listed as Synagogue of Spanish and Portuguese Jews, No 4 Heneage Lane)

TQ 3381 SW 11/363 4.1.50.
I
2. 1701. Plain, rectangular building of red brick with modest dressings of Portland stone. 2 tiers of windows, segmentally arched below and round-arched above, with semi-elliptical heads to larger, central openings in east and west elevations. Simple cornice and parapet. West doorway with segmental pediment on consoles and lamp on decorative iron bracket. Plain interior with gallery supported on Doric columns to 3 sides. Ceiling altered apparently in C19. Fittings remarkably complete and little altered from original arrangement, some being older than present building. They include wainscot, benches, railings, very finely carved echal or reredos, and 7 large brass chandeliers. This was the 2nd synagogue erected in England after the resettlement of 1656 and in its little altered state is of exceptional historic interest.

Listing NGR: TQ3339581257

Holland House, 1-4 and 32, Bury Street EC3

Heritage Category: Listed Building
Grade: II*
List Entry Number: 1064724
Date first listed: 05-Jun-1972
Date of most recent amendment: 29-Sep-1997

Details

TQ 3181 SW 627-0/11/362
BURY STREET Nos.1-4 and 32 (Holland House)
05/06/72
II* 1914, by Berlage. No 32 has narrow frontage with short return to east. Nos 1 to 4 form a long, separate frontage, connected at rear. Six storeys, Nos 1 and 2 set back. Polished black marble to base, doorways etc. Upper faced with faience: pronounced vertical ribs with sunk panels beneath windows and pierced parapet. Entrance to No 32 now blocked: carved corner feature with stylised prow of ship. Main entrance has wall decoration in glazed brick and tile and panels of mosaic to beamed ceiling. Rear of premises rebuilt to greater height.

Listing NGR: TQ3334881228

Appendix 2 - Bevis Marks Synagogue Setting Study

the S&P SEPHARDI community Bevis Marks

Planning application ref. 24/00021/FULEIA; proposed 43 storey tower at 31 Bury Street

Bevis Marks Synagogue in Judaism and Heritage: A Setting Study With Perspectives from Jewish Sources

20 November 2024

Rabbi Shalom Morris
Rabbi, Bevis Marks Synagogue
PhD Candidate, King's College London, Dept of History



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Chapter 1 - Introduction: Harm and Significance

One of the the most important elements of the significance of Bevis Marks Synagogue is the interplay between the historic building, its setting, and the community who have always worshiped there. However, the setting of the synagogue, its architectural purity, and the ability of its community to continue to use it for worship are at risk due to tall development to its south, notably at 31 Bury St.

As the original custodians of Bevis Marks Synagogue, we hope this paper will sufficiently explain elements of the synagogue's significance that are at risk due to developments that infringe on its remaining southern sky-view. It is our contention that this space must be protected at all costs to ensure the continuing significance, including functioning, of Bevis Marks Synagogue. In this sense, this is an existential matter both for the synagogue's future wellbeing, and for the Jewish community's continuing presence in the City of London, a place they have called home since the Resettlement of Anglo-Jewry began in 1656.

A. Significant Harm to Bevis Marks Synagogue

Grade-1 Listed Bevis Marks Synagogue is the UK's most historically-important synagogue. This is rooted in the synagogue's history, architecture, communal value, and religious traditions.

These elements of its significance, however, are at grave risk due to a planning application to construct of 43-story tower at the site of 31 Bury St, just to the synagogue's south.

The proposed tower will cause harm to the synagogue's:

1. Original architectural intent, which is its physical prominence over its setting. This prominence is important architecturally, historically, and religiously.
2. Religiously important sky views.
3. Interior light levels necessary for prayer.
4. The purposeful functioning of the synagogue's architecturally significant windows.
5. The amenity of the communally important courtyard.
6. The meaning of the synagogue's name.
7. The economic viability of the site.

These harms will be explained to in detail in the pages that follow. As Bevis Marks Synagogue is a site of such national and international significance, it is wholly unacceptable to cause this extent of harm to it. It breaches local and national planing policies, and inflicts particular harm to the country's Jewish community who relate to the synagogue much as the Church of England does to St Pauls' Cathedral.

B. The Synagogue's Unparalleled Significance

Bevis Marks Synagogue is the most historically significant synagogue in the United Kingdom. It was the first purpose-built synagogue constructed in England after Jews were readmitted to the country by Oliver Cromwell in 1656. Even until today, it is the only non-Christian house of worship in the City of London, and it existence represents both the City's and the country's history of religious tolerance.

The construction of Bevis Marks Synagogue began in 1699 in the years following the Great Fire of London. It was built in the style of Sir Christopher Wren and blends both Jewish and English architectural motifs. The synagogue was completed in 1701, before St Paul's Cathedral, making it one of the country's most-important houses of worship. It is a Grade-1 Listed building.

Bevis Marks Synagogue is also one of the most important synagogues in the world. Bevis Marks Synagogue is the world's only synagogue to have maintained regular worship dating back to its opening in 1701. Its congregation is comprised of descendants of families who have worship there throughout its centuries of existence. Bevis Marks Synagogue therefore is world Jewry's last remaining unbroken link to the pre-modern era.

This continuity has also allowed the synagogue's congregation to maintain its unique religious heritage and traditions, one of the last vestiges of Spanish & Portuguese Jewry. Furthermore, it's ritual is a blend of ancient Iberian Jewish traditions and English culture, making its intangible heritage of extreme significance to both Judaism and Britain.

C. This Report

A thorough understanding of a heritage-asset's significance is essential for planning authorities to make decisions that might harm said asset. Each heritage site's significance is unique to its particular history, location, function, etc. There are various contributing factors that include heritage, cultural understanding, function, and viability.

This becomes even more crucial when considering potential harm to a listed building, particularly one which is Grade-1 Listed. In such instances substantial harm should be wholly unacceptable, and where less than substantial harm would be caused, it must be outweighed by public benefits of equal significance. These are high bars to overcome.

Of particular concern is 31 Bury St, where a 43-storey tower is proposed. This site sits just twenty-five meters to the synagogue's south. In Historic England's objection letter to this scheme, they consider the harm that would result to the synagogue on account of its: 'intangible associations with its surroundings', 'patterns of use', and 'intentional intervisibility with other historic and natural features'.

This concern has already been confirmed by the City of London's Planning Committee in their decision in 2022 to refuse permission to a scheme on the same site of similar scale. This position is reinforced by the planning inspectors determination to refuse the Tulip proposal (to the synagogue's west) on account of the harm it would cause to the setting of the synagogue.

It is our understanding that Historic England offered to conduct a study in cooperation with the City of London to explore the contributors to the synagogue's significance, but that this offered was not accepted. The following work therefore documents the significant harm that overshadowing from 31 Bury St would cause to the synagogue's significance. This is rooted in an understanding of the unique history, religious meaning, architecture, and use of the site.

This work considers sources that may be unfamiliar to planing officers due to their unfamiliarity with Jewish texts, and records associated with Bevis Marks Synagogue. It is our hope that officers will see this as an opportunity to become better acquainted with wider range of materials than they've previously encountered, and as such will find themselves better acquainted with the significance of Bevis Marks Synagogue, and therefore why infringement to its remaining sky-view is wholly unacceptable in planning terms.

Chapter 2: Important Sources

In order to understand the significance of Bevis Marks Synagogue, it is essential to be familiar with both Jewish religious traditions and sources, as well as the collections of Bevis Marks Synagogue. On account of barriers associated with cultural understanding, language, and accessibility, many of these materials will be largely inaccessible to to those outside of the Jewish community, and indeed outside of the Bevis Marks Synagogue community. The following paragraphs therefore set out a brief introduction to them.

A. Religious Law

The primary text of Jewish law is the Hebrew Bible, though more specifically the Pentateuch (Five Books of Moses). This is often referred to as the Written Law. This distinguished it from what is otherwise called the Oral Law, which are Jewish religious traditions found in later Jewish works, in particular in the massive work called the Talmud (Babylonia, 6th century). The Talmud includes interpretations of the Biblical word, as well as additional rabbinical traditions, that together comprise the form that Judaism takes in its post-Biblical era.

In medieval times, additional Jewish communities took root outside of the Middle East, in particular in Spain and in France. These became known as Sephardi and Ashkenazi, respectively, and while largely the same, each community evolved in somewhat different ways religiously and culturally. For Sephardi Jews, the primary religiously legal work that outlines and directs their traditions is the *Shulhan Arukh* (R Yosef Karo, 16th century).

Beyond these sources, more localised traditions evolved following the Spanish Inquisition, particularly amongst those Sephardi Jews who remained in the West (the Atlantic), and those who settled in the former Ottoman Empire. The Western Sephardi Jews were known for their acculturation and rational Judaism, and those in the east for their religious mysticism.

The Western Sephardi Jews are otherwise known as the Spanish & Portuguese Jews, and are those who re-established London's Jewish community in 1656. They then opened Bevis Marks Synagogue in 1701, England's first purpose-built synagogue since Jews were expelled in 1290 by King Edward I.

B. Communal Records

The community at Bevis Marks Synagogue kept detailed records of their activities. As the only Jewish community, the 'synagogue' oversaw all of the the needs of its community. Their records therefore include minutes from all of this various activities which includes education, health, charity, and worship. These records are housed in the Metropolitan Archives and can be accessed with permission from the Spanish & Portuguese Jewish community.

The archives at large (kept in several other locations) also include historic photographs, prints and paintings, as well as religious objects produced by skilled craftsman, including Huguenot silver and fabric makers, and other archival materials.

Recordings of the synagogue's musical traditions have also been made and are freely available on its website. This is an incredibly important element in the community's intangible heritage, which is preserved and maintained at Bevis Marks Synagogue.

Of course, the most important element of the collection, is Bevis Marks Synagogue itself, which, together with its setting, remains largely as it was when it was opened in 1701.

Taken together, the collection makes up one of the most intact and important community Judaica collections in the world. The collections are vast. Those who study them are always discovering new materials and insights into the history, functioning and nature of this important community.

However, what makes the collection most remarkable is the living nature of it. That is to say, the interplay between the tangible and intangible heritage in a living historic community, that has remained active in its synagogue, in the City of London, for over three centuries. If any one element of this interplay is lost, then the collection in its entirety decreases in its value and significance.

Chapter 3: Brief Introduction to the Bevis Marks Synagogue and Community:

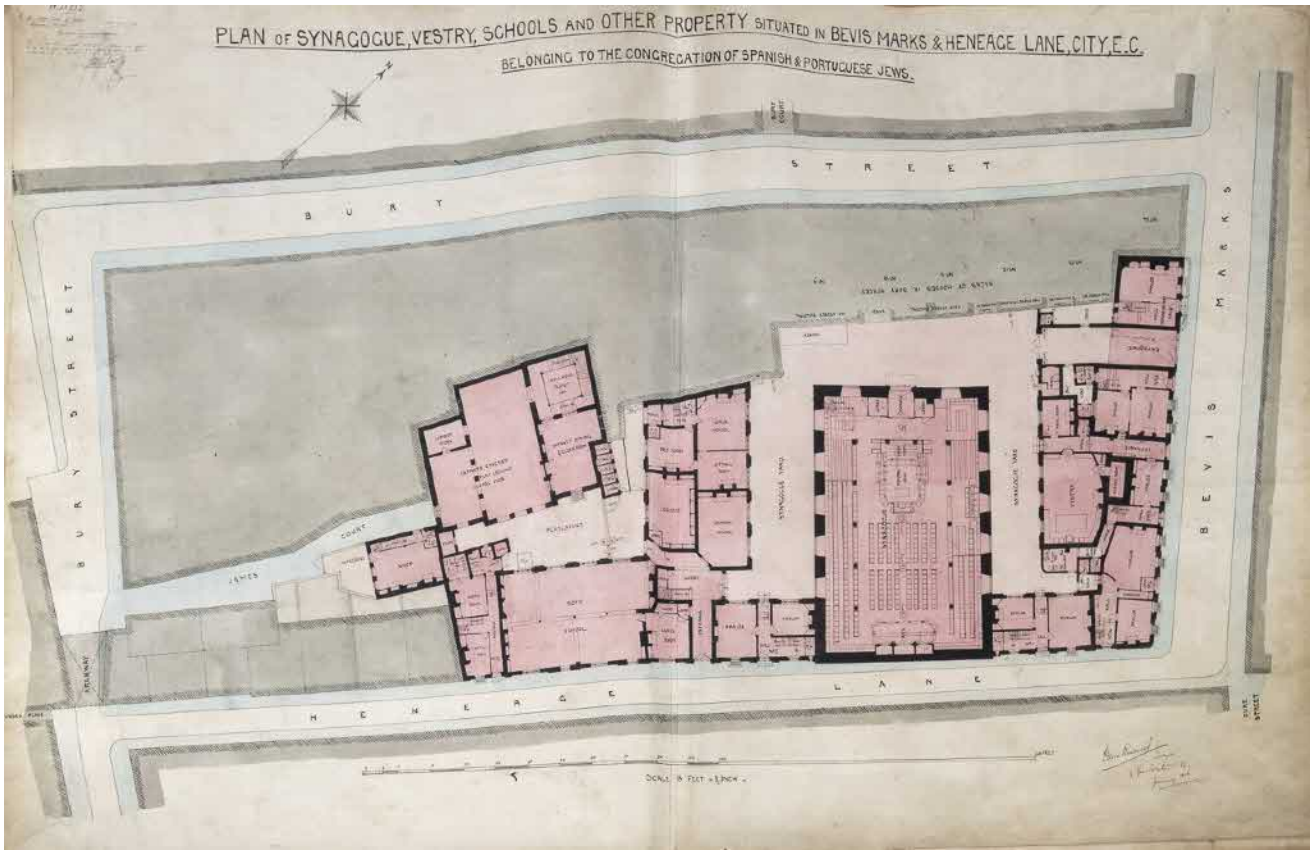
As stated abouve, one of the the most important elements of significance to Bevis Marks Synagogue is the interplay between the historic building, its setting, and the community who has always worshiped there.The setting of the synagogue, its architectural purity, and the ability of its community to continue to use it for worship are therefore key to understanding the synagogue's significance. This sections lays out a brief history of the synagogue itself and its community.

A. The Synagogue Site

Bevis Marks Synagogue was built by Spanish & Portuguese Jews, who first settled in London in the 1650s. The community was fleeing persecution in Spain and Portuguese due to the Inquisitions that had been established there in the preceding centuries. In London they found safety and the freedom to worship openly. They first worshiped in makeshift conditions in a converted synagogue in Creechurch lane, opened in 1657. As the community grew, they sought to construct a purpose-built synagogue on Bevis Marks. To this end they initially leased the land called Plough Yard, and later in the 1700s successfully purchased it outright.

Bevis Marks Synagogue was built from 1699-1701. It is the oldest synagogue in the UK, the only non-Christian house of worship in the City of London, and likely the only synagogue in Europe, or the world, in regular use dating back to its opening in the early eighteenth century. The synagogue was constructed by master builder Joseph Avis, likely according to the design of a Mr. Ransy produced in the years before the synagogue was built.

The synagogue was situated prominently in a courtyard and surrounded by a series of low-rise communal buildings, including schools, housing, offices, ritual baths, and a kosher shop. Through these, the community maintained numerous charitable organisations, including alms houses, medical facilities, and burial facilities on Mile End Road. The community continues to maintain many of these institutions, though their locations have moved across London. Some of the site was redeveloped in the late nineteenth century, though the contours of the site remain largely the same as they were in 1701, with the synagogue dominating its setting.



B. The Community Over Time

Over the centuries many important English Jews have attended Bevis Marks Synagogue, including Prime Minister Benjamin Disraeli, Philanthropist Sir Moses Montefiore, and national boxing champion Daniel Mendoza. Members of the community fought for Britain in the World Wars, including the first Jew to be awarded the Victoria Cross, Frank de Pass. Over sixty members of the community lost their lives fighting for Britain and their names appear on the synagogue's outer wall next to its main doorway. Bevis Marks Synagogue is widely considered the 'Cathedral Synagogue' of British Jewry, akin to St Paul's Cathedral for the Church of England.

The synagogue continues to function as regular place of Jewish worship, in line with its original traditions, and is populated with descendants of those who worshipped there when the synagogue was first opened in 1701. This community is augmented by other Jews living in Central London, City workers, students and visitors to London. The synagogue is also used for weddings, Bar and Bat Mitzvahs, Livery instillation services, national Jewish commemorations, major guest speakers, and other similar events.

Over the past number of years the synagogue has been constructing a new visitor centre with support from the NLHF. Due to this disruption the synagogue has been forced to scale back some of its services that were in place pre-covid. It continues to be open for some weekday services, and for all Sabbaths and Festivals. It is the intent of the community to resume full services with the opening of it centre in May 2025. The visitor centre hopes to welcome over 25k visitors each year, with weekday mornings dedicated to school groups from across the country and local area coming to learn about Judaism.

**Typical Anticipated Week at Bevis Marks Synagogue. Does Not Include Many Additional Festivals.*

*	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
8am	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers
9am	Morning Prayers						Morning Prayers
10am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
11am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
12pm	Visitors	Visitors	Visitors	Visitors	Visitors	Visitors	Morning Prayers
1pm	Visitors/ Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/ Prayer	Morning Prayers
2pm		Visitors	Visitors	Visitors	Visitors	Visitors	
3pm	Special Events	Visitors	Visitors	Visitors	Visitors	Visitors	
4pm	Special Events	Visitors	Visitors	Visitors	Visitors		
5pm	Special Events						
6pm	Special Events/ Prayer	Lectures/Prayer	Social Event/ Prayer			Sabbath Prayers	Sabbath Afternoon Prayers
7pm	Special Events	Lectures	Social Event			Sabbath Prayers	Sabbath Afternoon Prayers
8pm		Lectures	Social Event			Sabbath Prayers	
9pm			Social Event				

Chapter 4: Massing and Scale: The Synagogue's Setting

It is clear from a variety of sources that Bevis Marks Synagogue was constructed to dominate its setting. For those coming to it, the scale of the synagogue would have dominated amongst its surrounding. The following section sets out an understanding of the synagogue in relation to the area around it, and why further massing, particularly set behind it from the viewpoint of the courtyard entry area, would undermine this historic and religious setting.

This perspective was confirmed by the last planning decision in 2022 that ruled that a tall building at 31 Bury St was inappropriate on account of its overbearing nature on the Bevis Marks Synagogue. This goes beyond the notion of the juxtaposition of new and old, but particularly the experience of Bevis Marks Synagogue as viewed from within the synagogue courtyard.

Indeed, the Tulip inspection confirmed this notion by stating that every additional visible tall building further erodes the historic character of the courtyard setting. This is surely the case, when considering a tall building that would constitute the backdrop to the 1701 synagogue, and as such its massing would cause a grievous harm to the synagogue's protected setting which is necessary for understanding its historic, architectural and religious value. As such it would cause significant harm to its significance.

A. Historic Setting: Secluded Courtyard

Bevis Marks Synagogue is set in a courtyard. According to historians from the past century, this was for the purpose of secluding it from view on account of persistent anti-Jewish sentiment that had remained despite the Jewish community having already been established in the City of London for over four decades. According to some, there may have even been a regulation that required the synagogue be hidden from view off the main street.

More recently, some have suggested that placing the synagogue in a courtyard may have been reflective of the synagogue's prominence, as a way of giving it breathing room and removing it from the clatter and mess of the thoroughfare. Indeed, originally the synagogue courtyard was likely closed off with a solid wooden door, though since the nineteenth century this was been an iron gate permitting glimpses of the synagogue inside.

Whilst public buildings surround the courtyard, they are largely out of view as one enters the courtyard, thus maintaining this historic sense of seclusion. This historic experience can only be maintained by keeping the synagogue's backdrop clear of any overbearing intrusion, a context that would be lost should 31 Bury St be granted approval. There is an important difference between a secluded and an oppressive setting.





B. Religious Intent

According to Jewish religious tradition, a synagogue is meant to be the tallest building in an area. This is codified in Shulhan Arukh chapter 150 (OH). The chapter heading is 'The Building of a Synagogue and that it Should be Tall'. Below you can see the regulations requiring that the synagogue maintains this prominent position, even to the point of restricting heights of buildings constructed afterwards.

150:2 - The synagogue must be built at the height of the city, and it should be raised until it is taller than the usable parts of all other buildings,

150: 3 - If someone built/raised his house higher than the synagogue, some say that we force him to lower it.

The objective of these rulings are to ensure that the synagogue, and what it represents remains prominent amongst those coming to worship. Erosion to this sense of scale, erodes both the religious values that the synagogue's physical prominence represents, and its historic setting.

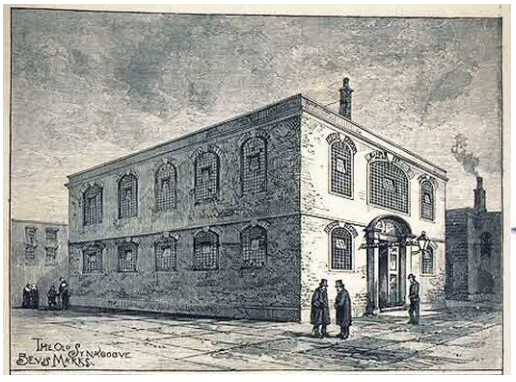
While no renderings have been found of the road Bevis Marks, a drawing from 1890 shows that at least in relation to the buildings next to the synagogue, the synagogue rose in view above them. At the very least, this sense of prominence would have been felt from within the courtyard setting, with no other buildings in view rising around it. It is this sense of scale, that must be preserved to maintain this important religious sense of prominence of Bevis Marks Synagogue mandated by Jewish tradition.

C. Architectural Intent

Beyond this, the synagogue's prominence on the urban landscape, at least from within the courtyard itself, was architecturally part of the original intent of its construction. The plan for Bevis Marks Synagogue was being crafted already in the 1690s. This took place following the Glorious Revolution when William of Orange came to the throne of England in 1688. The led to an increase in migration from the Netherlands and the Sephardi community located there. Amsterdam's Portuguese Jews had themselves completed construction of a new synagogue just a few years before in 1675.

The Amsterdam synagogue largely followed the model constructed by Rabbi Jacob Judah Leon. Leon was more widely known as Templo on account of a plan he drew of Solomon's Temple. It caused a stir and was even exhibited to King Charles II of England.The model placed the ancient Temple in a courtyard surrounded by ancillary buildings, with the Temple sitting prominently in the middle. This model was followed in the Amsterdam synagogue, as the contemporary synagogue in Jewish thought is considered a miniature of of the ancient Temple.

Bevis Marks Synagogue, constructed shortly afterwards, largely followed this paradigm, setting the synagogue in a courtyard, with prominence in relation to the buildings in view all around it. This prominence was not achieved in the manner of church spires, but through the massing of the synagogue itself in contrast to the buildings in view around it. This prominence is only maintained by ensuring its scale continues to dominated its surroundings, by carefully managing visible growth around it.



Bevis Marks Synagogue, 1890



Amsterdam Synagoge



Templo Model With the Temple Situated Atop a Buttressed Temple Mount

Chapter 5: The Sky View in the Synagogue's Setting

The protection of the synagogue's clear sky-view backdrop helps ensure the synagogue retains its historically important prominence as experienced from within the synagogue courtyard. The framing of the synagogue with the sky is what ensures this. However, beyond this, the sky view itself is intrinsic to the understanding of the synagogue and its use.

A. The Synagogue Name

The synagogue is commonly known as Bevis Marks on account of its location on this street. However, the synagogue's actual name is *Sha'ar Hashamayim*. This is Hebrew for 'The Gate of Heaven/Sky'. The origin of this term for a synagogue is in Genesis and the dream of Jacob and the ladder, where he views angels ascending and descending. Upon waking, Jacob exclaimed, 'How awesome is this place! This is none other than the house of God, and this is the gate of heaven' (Gen 28:17). According to Jewish tradition this location was Temple Mount in Jerusalem, hence the connection between House of God and Gate of Heaven.

In Hebrew the word *Shamayim* means both heaven and sky (as in the first verse in Genesis). This is rooted in a religious perspective that relates to heaven as it does to sky, hence the common looking upward to the sky when referring to God or heaven. As such, the sky backdrop is essential to understand the very essence of the synagogue congregation 'The Gate of Heaven/Sky' with its name etched in Hebrew above the synagogue gate and door.

The erosion of this sky view, in such a central location, set immediately behind the synagogue, that would result from 31 Bury St, should therefore be considered a significant harm to the synagogue's significance, and as such should be avoided.



B. *The Synagogue Emblem*

Beginning in the seventeenth century London's Sephardi community annually presented the Lord Mayor with a silver gift. While the exact design of this gift evolved over time, it always included the depiction of a Biblical scene, that of a sentry standing outside the Biblical Tabernacle/Meeting Tent, set in nature. The scene includes clouds and a tree..

The emblem was the official seal of the congregation, and was used on synagogue stamps, and on other communal objects. In these smaller objects the scene was reduced in size, making the original version important for understanding its full meaning.

The Tabernacle traveled with the Israelites as they encamped in the desert for forty years between their exodus from Egypt and eventual arrival in the Holy Land. It continued to serve as the central place of worship until ancient Israel constructed their permeant Temple in Jerusalem. As stated above, the modern-day synagogue is considered a miniature version of these earlier national temples.

That the community chose to illustrate the ancient Tabernacle with a demonstrable sky-setting, and then adopt it as their community's emblem, reinforces the degree to which the sky view is an intrinsic element of the synagogue's significance. Indeed, in the community emblem, the Hebrew name of the congregation 'Gate of Heaven/Sky' is written around it.





C. Religious Worship

The Sky view is also integral to Jewish religious worship. Each month members of the Jewish community go outside during the waxing moon. Upon viewing the moon in the night sky, a prayer is recited (*Kiddush Levana*). It is a prayer for renewal that relates to the moon's renewal during this phase of the moonscape.The prayer is typically said after the evening service, outside of the synagogue, as is both common today and as is depicted in historic drawings of the ritual from the time when the synagogue was constructed.

The synagogue has produced an extensive study of this ritual in the community's history and the negative impact that would be caused by tall buildings to the synagogue's south. These conclusions largely match those of BRE's independent review of GIA's report. However, in brief we will restate several points here.

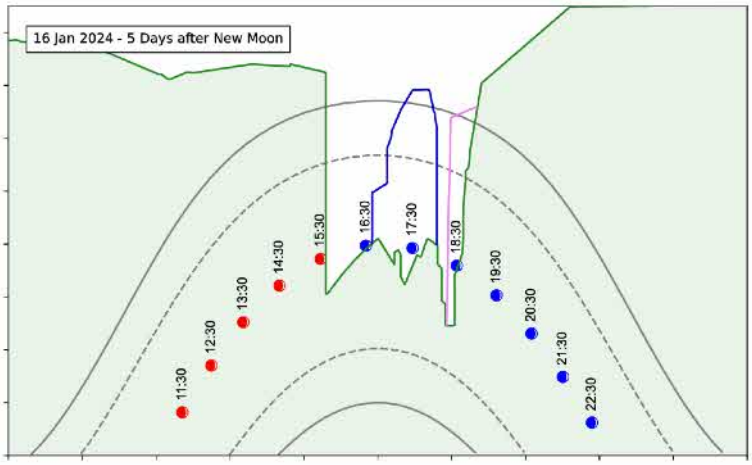
The prayer can only be recited on certain days of the month, and should 31 Bury St be permitted, it would obstruct these views entirely during several months of the year, and significantly reduce them in the remaining months. As such it would cause significant harm to the worship of this ancient Jewish community.

D. Religious Meaning

The use of the synagogue for Jewish worship is intrinsic to its significance. Part of that ritual requires views of the sky, and therefore any obstruction of this view must be considered a significant harm to the synagogue's significance.

Beyond this, views of the sky are important religiously and culturally in Judaism. Traditionally Jews observe the appearance of stars in in the night sky to determine the conclusion of the Sabbath, and the position of the sun in the daytime sky to determine the times for prayer.

Construction of a large tower to the synagogue's south would largely block-out these culturally important views, as the celestial bodies cross the sky along the southern horizon.





1695 Amsterdam Haggadah





Chapter 6: Courtyard Viability: At Risk

The courtyard at Bevis Marks Synagogue plays an important role in both the community's religious and communal activities, and for the synagogue's new heritage centre and cafe. The community at Bevis Marks Synagogue make regular use of the synagogue's courtyard for celebrations and gatherings. Furthermore, the courtyard will function as an important feature on the synagogue's new NLHF supported Heritage Centre, as both a key point for interpretation, and as a setting for its cafe.

The amenity of this space is therefore of utmost importance for the continued vitality and economic viability of this historic community. While it is difficult to quantify amenity, clearly the courtyard is a more enjoyable space with open sky, and without imposing and oppressive buildings overbearing and overshadowing the site. The degradation of the site that would be caused by the proposed tower is therefore both wholly inappropriate, and against planning policy that protects the viability of heritage assets. This negative impact should therefore be avoided.

A. Communal Use and Value

The courtyard at Bevis Marks Synagogue serves several different functions beyond just an access point for the synagogue and as the key location for appreciating the synagogue in its historic settings. The courtyard is also where the community gathers on regular occasion throughout the year.

The courtyard is often used by the worshiping community as a place to hold outdoor receptions following services, whether on a regular Sabbath, or on occasions when the congregation is celebrating a Bar or Bat Mitzvah. The community also utilises the courtyard for the celebration of Succot, Tabernacles, which is celebrated by enjoying food in the outdoor *succah,* hut. Beyond this, the courtyard is also used for Jewish after-work gatherings such as BBQs and other social events.

Additionally, the courtyard is utilised as part of wedding celebrations, which are held regularly at the synagogue throughout the year. In this space people take their first photographs as a married couple, attendees cheer as a couple makes their way out of the synagogue and into the vehicle awaiting them in the courtyard, and some even hold their wedding reception in this space.



B. Economic Impact

A core element in the synagogue's future viability, is its ability to generate income through weddings rentals, heritage visitors and new cafe. This will allow the community to maintain its Listed Building status, which would be at risk without this additional support.

The importance of the courtyard for weddings has already been explained. Beyond this, the courtyard will serve as an important function in the community's new heritage centre. It is here that visitors will purchase their entry tickets and collect their audio guides. In the courtyard the site's interpretation will begin with an introduction to the synagogue and an explanation of its setting.

Finally, another key component of the heritage centre's success is its new cafe. This will include outdoor seating, which is expected to be an important feature in encouraging visitors to purchase food and drink and to extend their visit.





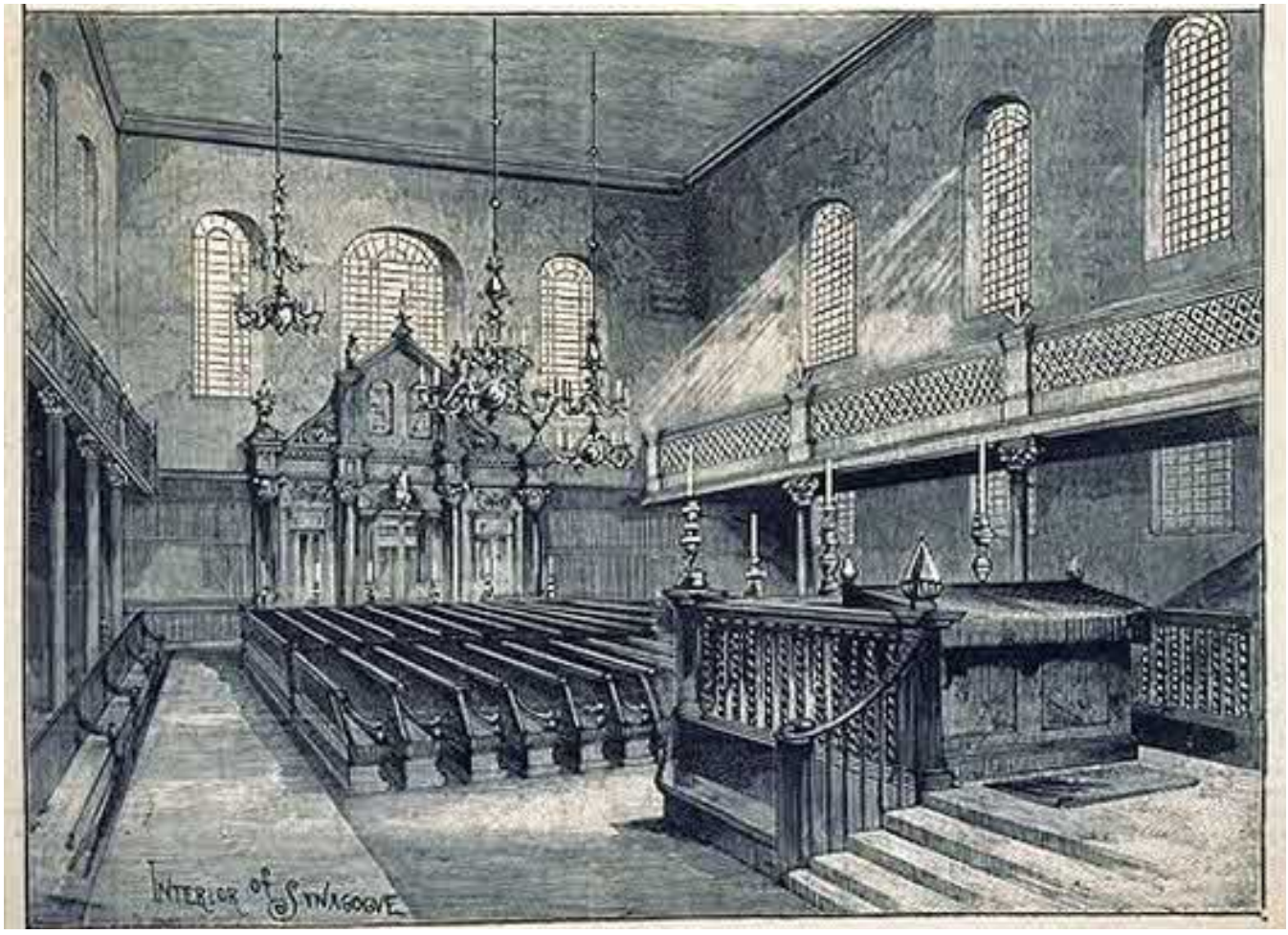
Chapter 7: Light, Windows, and the Synagogue's Architecture

While the majority of this study has focused on the exterior of the synagogue as it pertains to setting, setting within the framework of Bevis Marks Synagogue also pertains to its interior. This is because the synagogue was constructed with its relationship to its setting as central to a user's experience of the interior.

According to the Talmud, 'A person should pray only in a house with windows' (Berakhot 34b). Rabbi Yosef Karo in his work *Bet Yosef* quotes a number of explanations for this law. They include reasons that relate to the practical use of windows for light, as well as the religious significance of views to the outside during prayer through the windows.

For these reasons, further obstructing the synagogue's windows would cause a practical, architectural and religious harm to the synagogue, that relates to its very significance as a heritage and communal site of the greatest value. Most importantly, further reduction in synagogue's daylighting will render parts of the synagogue largely unusable for worship, the core function of the synagogue.

It is clear from historic drawing and paintings of the synagogue's interior that the synagogue was once bathed in light, as it was intended, both religiously and architecturally. Further reducing this feature should be considered a substantial harm to the synagogue's significance as the section below explains.



Bevis Marks Synagogue, 1890

A. Lighting Levels

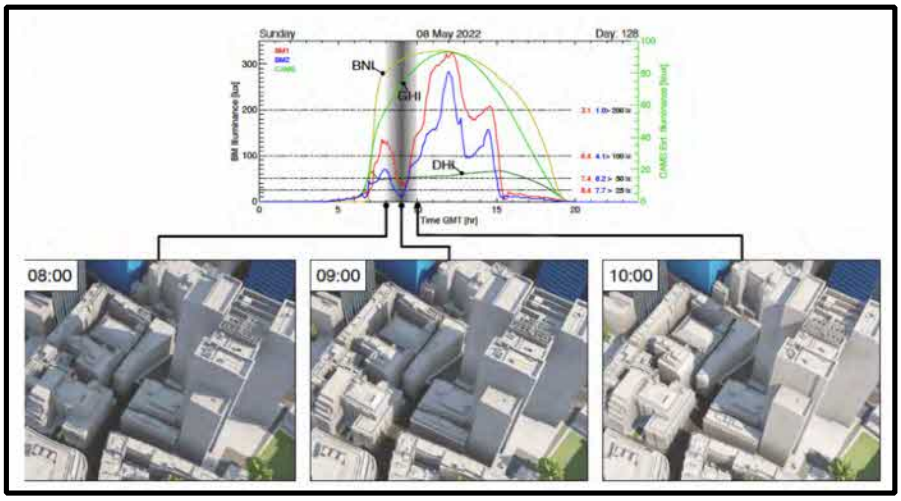
Rabbi Jonah of Gerona (thirteenth-century, Catalonia) explains the reason for requiring windows in a synagogue is that one's (religious and devotional) intention is better when there is light. Indeed, the Shulhan Arukh rules that 'One who builds facing a window of a synagogue, it is not sufficient to leave 4 cubits space, because it (ie. the synagogue) needs a lot of light' (OH 150:4).

Of course, sufficient light is necessary even for the most basic uses of the synagogue, such as the ability to read the prayer book. The synagogue's lighting is reliant on diffused light. Without this, congregants are forced to huddle beneath the limited artificial lighting that was added by the synagogue's columns in the 1920s. This is the case during an after-dark service (aside for special occasions when the synagogue lights its chandeliers, which takes hours to do so, and days to replace). However, during the day, when the congregation's main services are conducted, it is possible to sit anywhere throughout the synagogue and still read the prayers.

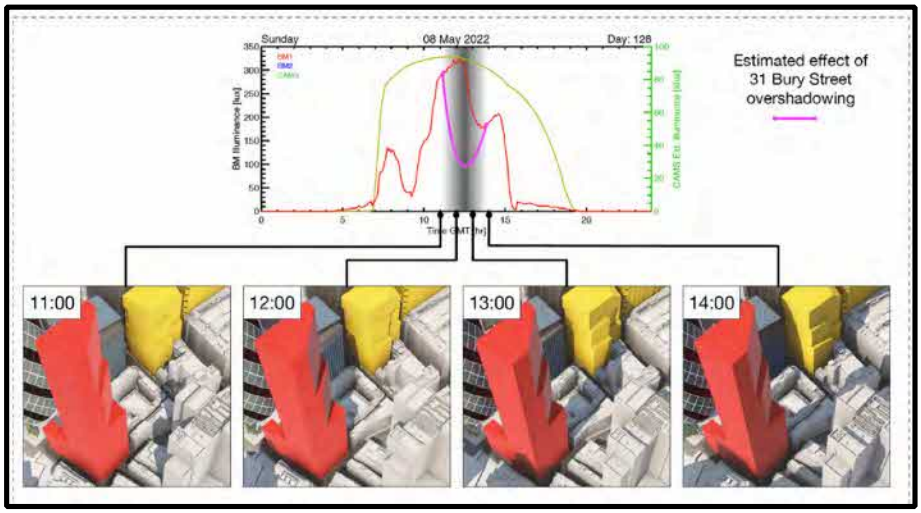
The synagogue has taken interior light-measure readings over the past two years with surprising results. The readers demonstrate that at times interior light levels can reach several hundred lux of light during the morning/midday hours. However, the readers also show a significant drop in light levels in the morning, a phenomenon which is explained by the construction of a tall building (1 Creechurch) twenty-five meters to the synagogue's east less than a decade ago.

It is reasonable to predict a similar impact would be caused by the proposed 31 Bury st as it would be located to the synagogue's south, at a similar distance away, and which will be twice in height as the previously mentioned tower.

Should light levels be further reduced during the daytime, this would render large areas of the synagogue as unusable for worship, the core function of the synagogue. This would constitute a significant harm to the synagogue as it infringes on the synagogue's core significance as a working synagogue, the only one in the world in continual use dating back to 1701.



1 Creechurch Impact



13

31 Bury St Impact

B. Interior Sky Views and their Religious Value

According to the preeminent Talmudic commentary Rashi (Rabbi Shlomo Yitzhaki, France, 11th century) the purpose in requiring a synagogue to have windows is because it exposes the sky, reminding us of our subordination to Heaven. Direct views of the sky still remain from the synagogue gallery. However, these views would be largely lost should permission be granted to 31 Bury St.

Furthermore, the ability to perceive change in the time of day is also important for the language of Jewish prayer. Indeed, as Jews pray three times a day, in morning, afternoon and evening, the language of Jewish prayers reflect these times of day for meaning. These include optimism at new beginnings (morning), endurance (midday), and protection from danger (night).

The ability to perceive the changing times of day is therefore integral to the Jewish tradition and the original construction of the synagogue as its windows on all four sides enabled this. The construction of taller buildings immediately surrounding the synagogue have historically all been capped at their current heights, with sloped roofs, to help preserve these remaining views. If taller buildings are constructed beyond these, these benefits will be lost.

C. Architectural Heritage

The synagogue's windows are an important architectural feature of the building. Its prominent Wren style windows are common amongst important buildings of this era. Their clear-pane glass was considered an innovation, improving upon the wonky glass of medieval times. It is for this reason that earlier churches often had small windows, and employed stained-glass, as the relatively opaque windows of the time were of little other value.

Strikingly, with the innovations of the era, prominent buildings began to feature large clear windows, that both allowed light to enter, and enabled views through them. This had a noticeable impact on the experience of places of worship, changing them from foreboding places with dark interiors, to light-filled spaces.

However, the increase in massing of the synagogue's surrounding area has led to a degradation of the synagogue's interior lighting and views out. Aside for the religious implications of this change, this eroding condition is rendering the synagogue's windows as increasing pointless, undermining their architecture interest and utility. This is a harm to the very fabric of the synagogue, as the lack of use of the windows in their original manner constitutes a harm to the ability to 'read' the space and its architectural intent and significance.



Chapter 8: Conclusion

The above study has demonstrated the wide-ranging harm that the proposed tower at 31 Bury St would cause to the significance of Grade-1 Listed Bevis Marks Synagogue. On account of its massing to the synagogue's south it would undermine the architectural, cultural, and religious integrity of the site and its continued use as a functioning synagogue.

The proposed tower will cause harm to the synagogue's:

1. Original architectural intent, which is its physical prominence over its setting. This prominence is important architecturally, historically, and religiously.
2. Religiously important sky views.
3. Interior light levels necessary for prayer.
4. The purposeful functioning of the synagogue's architecturally significant windows.
5. The amenity of the communally important courtyard.
6. The meaning of the synagogue's name.
7. The economic viability of the site.

The harms are so far reaching, and relate to the core significance of the synagogue in both architectural, historical and communal terms, that it is difficult to classify these harms as anything but substantial.

For these reasons, it should be clear that a tall building on the site of 31 Bury St is completely inappropriate in planning terms and should be refused just as it was two years ago.



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Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

15 May 2024

Dear Ms Tastoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we are writing to formally object to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

The proposals will have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and an unacceptable impact upon other heritage assets in the vicinity. A previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. Put simply, the revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the applications should be refused.

Significance of Bevis Marks Synagogue

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates back to 1701 and is the oldest and most historically significant synagogue in the country, often referred to as the 'Cathedral' Synagogue due to its significance within the Jewish faith. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance. The Synagogue stands within a courtyard which functions as part of the Synagogue and is of great value to the community as a social and religious space, for gathering before and after services and for holding events.

From an artistic and architectural perspective, the Synagogue is an excellent example of a simple, non-Anglican, 17th Century place of worship. The carpentry in the interior is of a very high quality and many original features remain. It is a building of enormous and profound significance. It has been continuously in use for worship since its construction and its discreet location within a courtyard open to the sky symbolises the complex history of Jewish people in Britain. The religious experience of the building is fundamental to its overall significance, alongside its architectural and historic significance.

When considering the impacts of the proposals on Bevis Marks Synagogue, it is necessary to understand and appreciate specific Jewish historical, cultural and religious considerations, such as the spiritual significance of the sky view and of natural light within the Synagogue.

The sky view at Bevis Marks is central to a number of rituals. The Jewish Sabbath concludes at the appearance of three stars which first appear in the darkening eastern sky. The beginning of each new Jewish (lunar) month is marked by the appearance of the new moon, at which time a special prayer (*kiddush lebana*) is recited. Should the view of the eastern and southern sky be erased, a highly important dimension of the Synagogue would be lost too.

The spiritual significance of natural daylight within the Synagogue must also be understood. The reading of printed texts is intrinsic to Jewish worship and the Synagogue was originally designed to admit plentiful light for this purpose. The only artificial light sources are candles and limited electrical lighting which was installed decades ago before the building was listed. The Synagogue has already experienced a substantial reduction in natural light as a result of the construction of other buildings. Further deterioration of the natural light will have profound implications for the religious value of the Synagogue as a spiritual space and house of Jewish prayer.

A letter from Rabbi Joseph Dweck, the Senior Rabbi of the S&P Sephardi Community of the United Kingdom, is enclosed at Appendix 2 which further explains the significance of the sky view and natural light at Bevis Marks to religious services and heritage. It is within this context and recognising the unique and outstanding significance of this Grade I Listed Building that the proposed development at Bury Street must be considered.

The Proposed Development

The proposed development comprises the demolition of Bury House and construction of a 43-storey tower, the partial demolition of Holland House and Renown House and extensions to both buildings, for office, flexible retail/café and flexible community/education/cultural/amenity uses.

Although the applicants make much of the evolution of the proposal from the previous version, in essence it is little different. A reduction in height of 19m is of no consequence when the remaining height is 178.7m, and the two high-level setbacks similarly make little or no difference to the proposed building's impact.

Indeed, the new proposal is even more damaging than its failed predecessor. The site now sits within a Conservation Area, to which statutory protection applies. Furthermore, it involves substantial alteration and extension to the Grade 2* Listed Holland House, which is a very significant heritage asset in its own right.

Planning Policy Context

Planning policy at all levels seeks to protect designated heritage assets from harmful impacts of development. Section 66 of the Town and Country Planning Act 1990 (as amended) states that:

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or as the case may be, the Secretary of State shall have **special regard to the desirability of preserving the building or its setting** or any features of special architectural or historic interest which it possesses".*

Section 72 of the Act states that the local planning authority also has a duty to pay special attention to "*the desirability of **preserving or enhancing the character or appearance***" of a Conservation Area.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is equally relevant. It states:

*"In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), **special attention** shall be paid to the desirability of **preserving or enhancing the character or appearance** of that area."*

Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with regard to the importance of the asset, irrespective of the level of harm. Paragraph 206 states that substantial harm to assets of the highest significance including Grade I listed buildings should be *"**wholly exceptional**"*.

Paragraph 207 of the NPPF states that:

*"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should **refuse consent**, unless it can be demonstrated that the substantial harm or total loss is **necessary** to achieve **significant public benefits** that outweigh that harm or loss'.*

Policy HC1 (Heritage Conservation and Growth) of the London Plan states that:

*"Development proposals affecting heritage assets, and their settings, should **conserve their significance**, by being sympathetic to the assets' significance and appreciation within their surroundings. The **cumulative impacts of incremental change** from development on heritage assets and their settings should also be **actively managed**."*

National and regional policy is reflected in policies DM12.1-DM12.3 of the adopted Local Plan and policies HE1-HE3 of the emerging Local Plan. Policy CS14 of the adopted Local Plan clearly states that proposals for tall buildings within conservation areas should be refused; it seeks to:

*"allow tall buildings of world class architecture and sustainable and accessible design in **suitable locations** and to ensure that they **take full account of the character of their surroundings**, enhance the skyline and provide a high quality public realm at ground level, by:*

*[…] **Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas;** the St. Paul's Heights area, St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map."*

It is notable that since the refusal of the previous application at Bury Street, the Creechurch Conservation Area was formally designated in January 2024, which encompasses both the site at Bury Street and the Bevis Marks Synagogue. The designation of the Conservation Area and the boundary chosen sought to achieve[1]:

1. A 'core' of special architectural and historic interest;
2. Fuller recognition of the Jewish history of the locality; and
3. A coherent and logical boundary which appropriately reflects the extent of the special architectural and historic interest of the Creechurch locality.

The Corporation's original proposal to exclude the site of 31 Bury Street from the Conservation Area was withdrawn following overwhelming consultee support for the proposed Conservation Area but objection to this aspect.

Another relevant change since the refusal of the previous application at Bury Street is the progress of the emerging City Plan which is now the subject of a Regulation 19 consultation (between 18 April and 31 May 2024). Our client has previously raised concerns about elements of the draft Plan and will respond to the consultation separately. We will not go into detail on these matters in this response; however there are two particular matters of concern:

1. The 'immediate setting' of Bevis Marks Synagogue identified in the draft plan. There is no statutory or other authority for the concept of 'immediate' setting, so the existence of this policy is questionable. However, should a specific setting policy be included in the adopted plan, it should recognise the setting of the Synagogue in its entirety, and particularly the importance of the sky view, in a similar manner to how views to and from The Monument are recognised.
2. The plan proposes to drop a long-standing presumption against tall buildings in Conservation Areas (as set out in Policy CS14 of the adopted Plan).

Paragraph 48 of the NPPF states:

"Local planning authorities may give weight to relevant policies in emerging plans according to:

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

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

In this case, very limited weight should be given to the policies in the emerging Local Plan, on the basis that it is at Regulation 19 stage and has not yet been submitted for examination, and that there are significant unresolved objections from our client and other stakeholders, relating to the fundamentally important matters set out above among other issues.

[1] CCA Proposal Presented to the Planning and Transportation Committee on 12th December 2024

Impact of the Proposals on Bevis Marks Synagogue

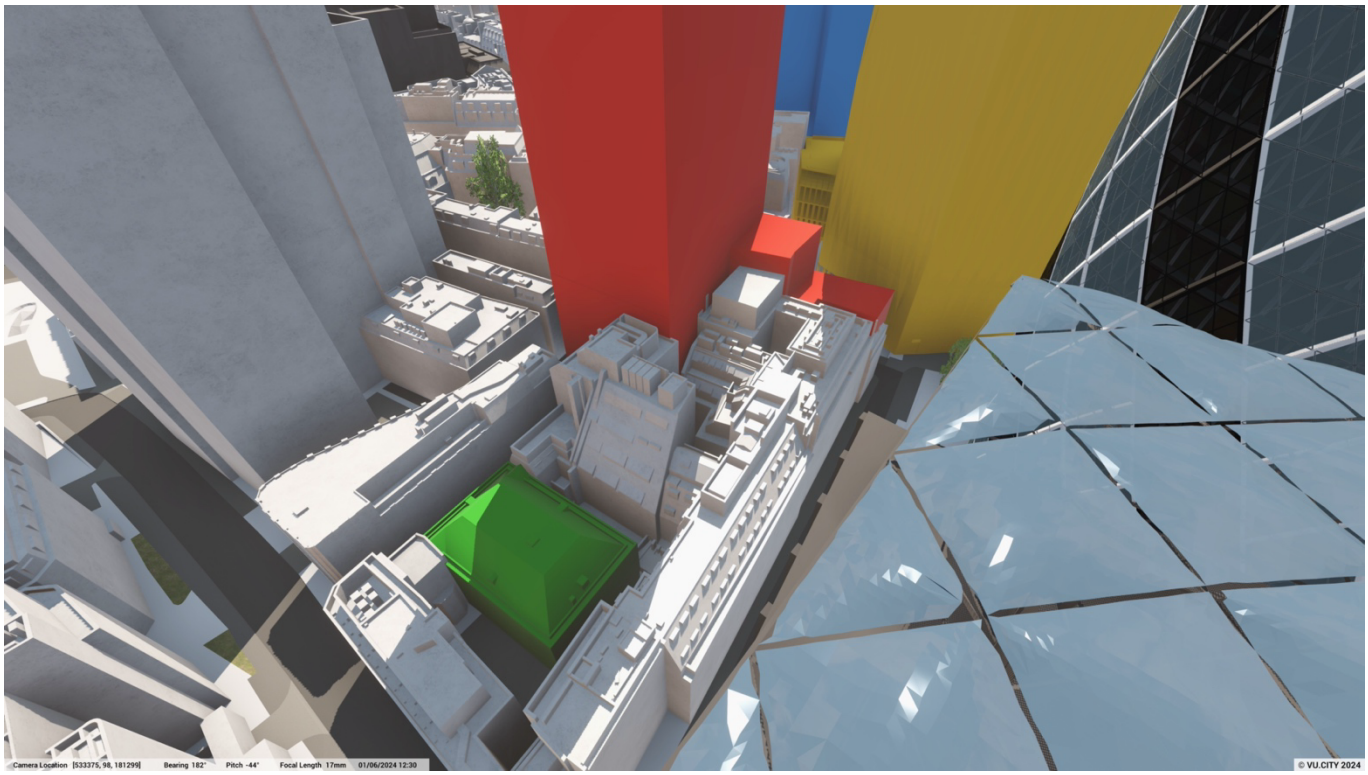
The application site is located only about 25m from Bevis Marks Synagogue at the closest point. This is shown graphically in the VuCity image reproduced as Figure 1 below.

The previous application at this site (ref. 20/00848/FULEIA) was refused on the basis of harm to the Bevis Marks Synagogue and the Tower of London. The first reason for refusal was:

"The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), […]

Our client does not consider that the amended proposals overcome this reason for refusal. The impact of the current proposals on the Synagogue is summarised below, specifically in terms of its setting and daylight, sunlight and overshadowing.

Figure 1: VuCity Image of the Proposals (in red) - Bevis Marks Synagogue indicated in green



Heritage Impact and Setting

A Heritage Assessment of the proposed development has been prepared by Alec Forshaw, who was the author of the option three proposal for the designation of Creechurch Conservation Area (the option which was eventually endorsed by the City of London) (Appendix 1). He has a deep understanding of the local context and significant experience; in addition, he was previously the Principal Conservation and Design Officer for the neighbouring London Borough of Islington and has written widely on historical and architectural matters.

The Heritage Assessment concludes that the proposals would result in harm as follows:

- **Substantial harm** to the significance of Bevis Marks Synagogue and its setting. The report concludes that "*By reason of its height and proximity the proposed tower will overwhelm the Synagogue. The visual and psychological impact on the courtyard would be catastrophic, equally severe as the previously refused scheme*". The assessment explains that the impact on the Synagogue and its courtyard is both tangible and intangible; and that the applicant has demonstrated a lack of understanding of the significance of the Synagogue and its courtyard.
- **Substantial harm** to the character and appearance of the Creechurch Conservation Area. The report states that: "*were the proposed development to be allowed it would render the designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise*".
- **A moderately high degree of less than substantial harm** to the setting of St Katherine Cree church.
- **A moderate degree of less than substantial harm** to the setting of Grade I Listed St Botolph's.
- **A high degree of less than substantial harm** to Holland House as a result of alterations to its fabric, plan form and integrity, and the impact on its setting as a result of the proposed tower.
- **A minor degree of less than substantial harm** to the setting of Aldgate School.
- **A moderately high degree of less than substantial harm** to the setting of 2-16 Creechurch Lane.
- A serious incursion into the backdrop of the Tower of London which will cause harm to its setting.
- **A moderately high degree of less than substantial harm** to the Port of London Authority Building.
- **A moderately low degree of less than substantial harm** to the setting of 38 St Mary Axe.
- **A moderate degree of less than substantial harm** to the setting of Lloyd's Avenue Conservation Area.
- **A high degree of less than substantial harm** to Renown House as a result of the demolition of key features of the building and the impact on its setting as a result of the proposed tower.
- **A moderately high degree of less than substantial harm** to the Rabbi's House and Vestry and 2 and 4 Heneage Lane.
- **A moderately high degree of less than substantial harm** to the setting of Cree House, 18-20 Creechurch Lane, Fibi House, 22-24 Creechurch Lane, Sugar Bakers' Court, 12-14 and 27-31 Mitre Street.

The Heritage Assessment also assesses the claimed heritage benefits of the proposed development. In summary regarding the proposed benefits:

- The proposed repairs and renovations to Holland House should be regarded as routine and not a benefit (and it will suffer a high degree of less than substantial harm from the proposed works);

- The proposed reinstatement of Heneage Lane is at a different angle from the original lane and it would be gated and closed at night; the claim that this is being restored is historically inaccurate and misleading;
- The proposed reinstatement of St James Court significantly reduces the size of the existing open courtyard which sits more accurately on the original site of James Court. This causes heritage harm rather than a benefit.

Overall, the proposed development is considered to cause substantial harm to the Creechurch Conservation Area and substantial harm to the Bevis Marks Synagogue, and several cases of less than substantial harm to a range of designated and undesignated heritage assets. Cumulatively, the degree of harm is serious and must be given very great weight. The public benefits claimed by the applicant go nowhere near to outweighing the harm, and this is discussed further below.

Daylight, Sunlight and Overshadowing

A Daylight Sunlight and Overshadowing Report has been prepared by GIA and submitted on behalf of the Applicant.

Daylight

The report acknowledges at paragraph 6.8 that *'the existing baseline daylight values within the Central Room and Gallery [in Bevis Marks Synagogue] are already very low'*.

GIA has carried out a VSC assessment to demonstrate the changes to daylight at Bevis Marks Synagogue as a result of the proposed development. It initially considers the 'consented baseline', assessing the future daylight levels with surrounding consented developments built out, but without the proposed development. The report explains that when surrounding consented developments are built, the Synagogue will experience a 19.1% reduction from the existing baseline in terms of daylight to the central room, and a 20% reduction to the gallery.

When the proposed development is taken into account, the Synagogue would experience a further 10.5% reduction from the consented baseline in the central room, and a further 10% from the consented baseline in the gallery.

The GIA report says that the proposals would have a lower quantitative impact on daylight at the Synagogue than other consented developments and implies that this is of no consequence, which is misleading and downgrades the cumulative impact. However:

a) The fact that the Synagogue is already going to experience loss of daylight is not an argument in favour of the Applicant; rather, it demonstrates the need to protect the precious remaining daylight and for the current proposals to come under even greater scrutiny. If a developer proposed a polluting factory close to an area of ecological importance, no one would rationally argue that its impact on the ecological area mattered less because the habitat was already vulnerable. The very opposite is the case.

b) No account is taken of the fact that the Synagogue is illuminated primarily by natural light and by candles, or that the reading of printed scripts is fundamental to worship. This is one of the most natural light-sensitive places in London.

c) The Synagogue is simply labelled as a "religious" building, disregarding the fact that it is also the centre of a thriving community.

Sunlight and Overshadowing

The GIA report also considers overshadowing to the Synagogue courtyard. It concludes that the sunlight availability is already very limited in the courtyard, compared to what would be expected in an unobstructed open space. This is a false comparison to make in a dense urban setting like the City. It claims that already consented schemes would result in a 30-minute loss of sunlight in the courtyard on average, reducing the maximum hours to only 1.5 hours in June. The proposed development would effect a further reduction of up to 19 minutes, which it considers to be a ‘marginal’ reduction.

This is a glib value judgement. The fact the courtyard receives any sun makes it a valuable asset for the community uses that take place there. Losing a further 20% would undermine the benefit and utilisation of the outdoor space for that purpose.

The loss of nearly a fifth of the sunlight within the courtyard cannot rationally be considered to be of little consequence in the context of an already very low level of sunlight. Furthermore, the courtyard is treated as though it is mere circulation space, and the Synagogue is labelled only as a "religious" building. No account is taken of the fact that the courtyard space is used intensively for rituals, and for family and community activities; or that it is the only space - and indeed the original planned space - from which this remarkable heritage asset can be viewed.

Night Sky

When considering the night sky visibility, a fisheye view has been shown from three viewpoints within the courtyard; in two of these the proposed development is visible and covers part of the sky view. However, the fisheye view is not comparable to the way in which the night sky is experienced by the human eye. A more accurate view is shown in the applicant’s TVIA (Figure 2 below). This shows how the proposed development would have a significant impact in blocking views of the sky from the courtyard.

None of the analysis addresses the critical religious and cultural significance of the sky view. Although very different in certain respects, there is a parallel to be drawn with Stonehenge, where the view of the sun on Midsummer's Day is essential to an understanding of the significance of this monument. Likewise, the iconic silhouette of the Taj Mahal against the sunset gives the viewer a feeling of spiritual uplift: they are no longer simply observing a fine building.

At Bevis Marks, the view of the passage of the moon across the night sky (as shown in Figure 3) is highly symbolic and intimately related to the traditions and rituals of the Synagogue, and is a most important aspect of the heritage value of the building.

Figure 2: Existing vs Proposed (cumulative) view from Bevis Marks Synagogue courtyard (Source: TVIA, The Townscape Consultancy)



Figure 3: Stills showing the passage of the moon across the sky as viewed from the courtyard



Overall, the GIA report is a typical attempt to employ technical analysis to distract the reader from the uncomfortable truth: that daylight and sunlight and the sky view are very important both to the functioning and the heritage significance of the Synagogue; that the Synagogue's daylight and sunlight is already substantially compromised; and that the proposed development would make the situation substantially worse.

Equalities

Section 149 of the Equality Act (2010) requires public authorities to have due regard to equality considerations when exercising their functions, including decision making on planning applications. An Equality Statement has been prepared by Quod and submitted on behalf of the applicant.

This Equality Statement considers the impact of the proposals on the Synagogue as a place of worship and acknowledges that the amenity of the Synagogue may be affected by the proposals, however it is said this "*would not preclude the use of these spaces for religious ceremonies*". There is no mitigation proposed.

It is considered by our client that the Equality Statement is inadequate in assessing the proposed impacts of the development on the operation of the Synagogue. A Protestant community could hold a Holy Communion service in a dark room or a disused factory. However, to do so would be strip the service of the many layers of ceremony and spectacle that make the difference between something that is a mere performance and something that carries cultural and spiritual significance. What is at stake here is the very qualities that make the Synagogue both a thriving centre of the Jewish community and the embodiment of a set of 300-year-old traditions. The author of the assessment does not demonstrate any understanding of these matters.

Not only does the Equality Statement demonstrate a lack of understanding of the impact of the proposals on the Synagogue. It implies that the impact of the proposals on the Synagogue is outweighed by other factors such as the increased provision of commercial floorspace. This may be relevant to the planning balance, but it has no place in an Equality Statement. The Statement is fundamentally flawed and certainly should not be relied upon by Officers to demonstrate their compliance with Section 149 of the Equality Act.

Planning Balance

The proposed development has been found to result in substantial harm to both Bevis Marks Synagogue and the Creechurch Conservation Area. Therefore, as per paragraph 207 of the NPPF, the application should be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve significant public benefits that outweigh that harm.

Chapter 6 of the submitted Planning Statement sets out a series of economic, social and environmental benefits which are alleged to result from the proposed development.

The PPG[2] explains that "public benefits" should be of a nature or scale to be of benefit to the public at large and not just a private benefit.

A number of the benefits claimed by the applicant. It claims that the proposed development would make a meaningful contribution to strategic policy objectives of the Eastern (City) Cluster including delivery of additional office floorspace. However, this is spurious. Policy CS14 is clear that tall buildings should not be permitted in Conservation Areas, and the policy towards the Eastern (City) Cluster (Policy CS7) is clear that tall buildings will be restricted to appropriate sites, respecting the *"conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views"*.

[2] Paragraph: 020 Reference ID: 18a-020-20190723

Other claimed "benefits" include:

- Provision of affordable workspace.
- Aspiration to achieve a BREEAM ‘Outstanding’ rating.
- Delivery of 619 sqm of high-quality public realm.
- Urban Greening Factor of at least 0.31.
- Delivering a building that is 28.6% more efficient in terms of overall regulated operational carbon compared to the existing individual buildings.

These are not public benefits. They are simply normal policy requirements without which no large office building would be allowed anywhere in the City. Furthermore, an "aspiration" must be viewed with scepticism.

The financial "benefits" relating to S106 and CIL payments are not public benefits either: they are payments required to mitigate the impact of the development; they should be considered as neutral within the planning balance:

- CIL payments of over £10m.
- Comprehensive S106 package including contributions to affordable housing, security and skills training.

The following claimed heritage "benefits" would in fact cause heritage harm (see above):

- Reintroduction of the historic Heneage Lane. *This would be open only between 7am and 11pm, and not on the original alignment.*
- Re-establishment of St James’ Court, a new pocket park. *This would be smaller, and not on the original site.*
- Restoration of and sensitive extensions to Holland House. *Renovation is a routine responsibility and many of the proposed alterations would cause harm.*

Of the remaining claimed benefits, a number are not ‘true’ public benefits and should not be given weight in the planning balance:

- Public art in Heneage Arcade. *This is not ‘public’ but located in a privately owned arcade which is shut between the hours of 11pm to 7am.*
- Aspiration to achieve other voluntary ratings such as NABERS 5*, Active ‘platinum’, Wired ‘platinum’, and Well ‘Platinum’. *Mere "aspirations" should not be taken into account.*
- Dedicated cycle repair and wellness space at lower ground floor level; operation of a social enterprise which trains young unemployed adults to service office tenants’ bikes. *This cannot be said to be of a scale which would benefit the public at large, as required by the PPG. Only office tenants would be likely to benefit.*

We comment on other claimed "benefits" as follows:

- Employment opportunities during the construction (270 FTE jobs over 4.8 years) and operational phase (up to 2,470 jobs). The construction phase benefits are temporary and therefore should be afforded limited weight. *The operational jobs are capable of being achieved on many other, less sensitive, sites.*
- Replacement of obsolete office space with over 34,000sqm of new high quality office space, which will meet a specific local demand for smaller floorplates. *There is no convincing evidence that the existing building is incapable of re-use, and its demolition would in any event release embodied carbon, which is a disbenefit.*
- Delivery of a new high-quality tall building and wider transformative reimagination of an urban block. *There are many other less sensitive sites where a high quality tall building could be delivered. This urban block, which is part of a Conservation Area, does not need "transformative reimagination".*
- Significant spending of new employees on-site which would equate to between £5.8m and £7.6m annually (an increase of £4.8m to £6.7m over the existing site). *As with operational jobs, this expenditure is capable of being achieved through the redevelopment of many other, less sensitive, sites.*
- Provision of 1,176 sqm of 'community workspace' at 50% market rent for qualifying occupiers or zero rent for charities. *This is a potential public benefit, though it is unclear whether it would meet a specific need. It could also be delivered on another, less sensitive site.*
- Provision of 1,072 sqm of publicly accessible space over three floors at the 'Holland House Hub' which will be free to use for community, multi-faith, cultural and education groups. *This is a potential public benefit. It could also be delivered on another, less sensitive site.*
- Provision of 'Creechurch Hall' a 339 multi-functional auditorium space delivering a range of uses such as lectures, sports and performances, for use by office tenants as well as members of the public for free at defined times. *The use of Creechurch Hall by members of the public is a potential public benefit, though it is unclear whether it would meet a specific need and it is unclear when or how often the 'defined times' would be. It could also be delivered on another, less sensitive site.*
- Provision of small and flexible retail space at ground floor level to meet local worker, visitor and residential needs. *There is no shortage of such space within the City.*
- Off-site public realm enhancement along Bury Street. *There is no need for such enhancement within what is a Conservation Area.*
- Greater than 300% biodiversity net gain. *A sensitive re-use of the existing buildings could achieve a substantial increase in BNG.*

The Heritage Assessment at Appendix 1 identifies that the scheme will cause substantial heritage harm on two counts, to Bevis Marks Synagogue and the Creechurch Lane Conservation Area. In addition, it will cause less than substantial harm on a number of counts to a range of heritage assets. Substantial harm to even one heritage asset would require "wholly exceptional" justification under the NPPF; here, the cumulative harm is such that it is difficult to envisage the sort and scale of public benefits that would have to be generated.

The package of public benefits proposed by the applicants does not add up to anything like this level of justification. They are typical benefits which any major commercial scheme would be expected to deliver, and they are generally exaggerated. Furthermore, they are not unique to the site at Bury Street, and they could be delivered elsewhere within the City of London without causing substantial heritage harm.

The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the application should be refused.

We reserve the right to add to this objection or submit further supporting material in due course.

Yours sincerely,

Roger Hepher
Executive Director

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Appendix 1 – Heritage Assessment Prepared by Alec Forshaw

HERITAGE ASSESSMENT V3 ON BEHALF OF THE SEPHARDI COMMUNITY BEVIS MARKS
WITH REGARDS TO PROPOSED DEVELOPMENT AT BURY HOUSE, 1-4 and 31-34 BURY STREET
PLANNING APPLICATION REF: 24/00021/FULEIA
LISTED BUILDING CONSENT REF: 24/00011/LBC

SCOPE OF THIS REPORT

1. This report, prepared on behalf of the Sephardi Community Bevis Marks focusses on the heritage impacts of the proposals within the local and immediate area, including the Tower of London. It does not consider the potential impacts on long-distance or riverside views of St Paul's Cathedral. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, and to other London boroughs such as Lambeth and Southwark whose own protected local views may potentially be affected.

DESCRIPTION OF PROPOSALS

2. Planning permission is sought for: "Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7 metres AOD); partial demolition of Holland House and Renown House: restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05 metres AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49 metres AOD); interconnection of the three buildings; use of the buildings for office, flexible retail/café, and flexible community/education/cultural/amenity uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works."
3. Listed Building Consent is sought for: "Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works."
4. Overall, the scheme provides 34,584 square metres of office which includes 1,176 square metres of 'community workspace'; 1,411 square metres of flexible community/education/cultural space which includes a 339 square metre auditorium; 504

square metres of retail space; 4,794 square metres of plant and service accommodation. The total floorspace is 41,293 square metres, compared with 11,339 square metres in the existing three buildings.

BACKGROUND TO THE CURRENT PROPOSALS

5. In October 2020 an application was submitted for the demolition and redevelopment of Bury House, 31 Bury Street, for a 49 storey office tower. Despite officer recommendation for approval this application was refused by the City Corporation in June 2022, on two grounds, namely harm to the setting and amenities of the Grade 1 listed Bevis Mark Synagogue by reason of the overbearing and overshadowing impact on the courtyard of the Synagogue, and harm to the setting of the Tower of London World Heritage Site, neither of which were outweighed by public benefits.

6. Since then, the current applicant has acquired the adjoining properties of Holland House, 1-4 and 32 Bury Street, and Renown House, 33-34 Bury Street which are now included in this new application. Holland House is a statutorily listed building, and the proposals now require both planning permission and listed building consent.

7. The whole of the site has been included in the new Creechurch Conservation Area, approved by the City Corporation in December 2023 which necessarily introduces additional policy and heritage considerations to the previous scheme.

POLICIES TO PROTECT THE HISTORIC ENVIRONMENT

8. The following statutes, policies and guidance are relevant:

Planning (Listed Buildings and Conservation Areas) Act 1990

Under Section 66 (1) the Local Planning Authority has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

Under Section 72 (1) in considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Chapter 16 of National Planning Policy Framework 2023

National Planning Practice Guidance

The London Plan 2021

City of London Plan 2015

Draft New City Plan 2040 (emerging policies pre-Regulation 19)

Supplementary Planning Guidance SPDs

ASSESSMENT OF HERITAGE ASSETS AND THEIR SIGNIFICANCE

9. In order to evaluate the impact of potential development on heritage assets it is important to understand their heritage significance. The National Planning Policy Framework Annex 2 states that significance is 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 its physical presence but also from its setting. These criteria accord broadly with those set out in historic England's Conservation Principles, namely evidential, historical, aesthetic and communal.

1. DESIGNATED HERITAGE ASSETS

Creechurch Conservation Area

10. The Creechurch Conservation Area was designated by the City Corporation on 11th January 2024. The designation was subject to very widespread public consultation in 2023 which drew an unprecedented response both from the public as well as very many heritage bodies and sources of expertise.

11. Having initially proposed a very small area, which excluded 31 Bury Street, the City planning officer was persuaded that other options should be consulted upon. A larger area (Option 3) was adopted in line with the great majority of public opinion. It was concluded in the Creechurch Conservation Area Proposal Report December 2023 that this would achieve (1) A 'core' of special architectural and historic interest (2) Fuller recognition of the Jewish history of the locality (3) A coherent and logical boundary which appropriately reflects the extent of the special architectural and historic interest of the Creechurch locality

12. The Report also states that 31 Bury Street is "instrumental in defining the end of Heneage Lane, is physically attached to the Grade II* listed Holland House and makes a more coherent boundary at this point of the Conservation Area". The whole of the application site, including 31 Bury Street, lies within the new Conservation Area. A Management Plan is in the process of preparation but has not yet been subject to public consultation.

13. The City Planning officer's designation report in January 2024 noted the special architectural and historic interest of the area, "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."

14. It is considered that the Creechurch Conservation Area has a **HIGH** level of significance in terms of the archaeological, architectural and historic criteria set out in paragraph 9 above. The communal/cultural/artistic significance of the area is **VERY HIGH** owing to the outstanding importance of the area to the establishment, development and on-going activities of the Jewish community.

Bevis Marks Synagogue

15. Listed Grade I the Bevis Marks Synagogue is of **VERY HIGH** significance. Built in 1699-1701 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. It is a unique centre for traditional Jewish worship and ceremony and draws a large congregation from across London and beyond. It also attracts visitors from all over the world, and current development of a museum and visitor will likely greatly increase their number.

16. The courtyard of the Synagogue is extremely important to its heritage significance, a matter that is under-appreciated by the applicant. This paved space not only provides the immediate setting for the Synagogue itself (built as was required in 1699 so as not to front directly onto a street) but it also serves as an important place of assembly, congregation and ritual. Open sky views from this secluded setting are extremely important to the character and appearance of the courtyard itself, as well as to the Synagogue Building. The sky view is not just a matter of physical setting but is also of great symbolic and ritualist importance, and a major part of the intangible cultural significance of the heritage asset. The current improvement and renovation work due to be completed shortly will further enhance the appearance and accessibility of the courtyard.

St Katharine Cree

17. Listed Grade I the church of St Katharine Cree predates the Great Fire of London, and is one of the 'anchor' heritage assets in the locality. It is of **VERY HIGH** architectural, historic and archaeological significance. Its tower is an important townscape feature and is silhouetted against clear sky in views from Leadenhall Street. Its setting is an important part of its significance.

St Botolph's Aldgate

18. Listed Grade I the church of St Botolph's Aldgate possesses **VERY HIGH** architectural and historic significance. The tower and spire rise prominently from the body of the church into open clear sky and have a landmark quality. It is noted as having

Skyline Presence in the City Corporation's Protected View SPD 2012. Its setting is therefore a very important part of its significance.

Holland House

19. Listed Grade II*, Holland House is of **VERY HIGH** architectural significance, identified as one of the 'standout buildings in the locality'. It also has **HIGH** historic significance owing to the circumstances of its construction. It does not possess any special cultural or communal significance.

Aldgate (formerly Sir John Cass) School

20. Listed Grade II* as a fine example of the 'Wrennaissance' style and for internal elements of outstanding interest, including 17th and 18th century fabric from other buildings, Aldgate School has **VERY HIGH** architectural, artistic and historic significance. Located on the site of the former Priory it has **HIGH** archaeological significance. Its setting is an important part of its significance. A sense of openness is retained in the playgrounds. The building is prominent within the locality and is the focus of a number of views from surrounding streets and open spaces.

2-16 Creechurch Lane

21. Listed Grade II, these fine five-storey former tea warehouses have **HIGH** architectural and historic significance, which 'gives a typical flavour of the locality'.

Tower of London

22. One of London's four UNESCO World Heritage Sites, the Tower of London is of **VERY HIGH** significance on all four heritage interest criteria. Its setting is also of **VERY HIGH** significance, particularly views from the south and east.

Port of London Building 10 Trinity Square

23. Listed Grade II* the prominent square stepped tower is identified as a City landmark and skyline feature in the Protected Views SPD.

38 St Mary Axe

24. Listed Grade II this well-proportioned stone-faced commercial building, designed by Sir Edwin Cooper in 1922, has **HIGH** architectural significance.

Lloyd's Avenue Conservation Area

25. The Lloyd's Avenue Conservation Area, designated in 1981 and enlarged in 2007, is focussed on the Edwardian street of Lloyd's Avenue, but also extends to include buildings on the north side of Fenchurch Street. Noted for its consistent scale, architectural style and materials it has **HIGH** architectural and historic significance. Elaborate stone dormers and turrets contribute to a dramatic roofscape on Fenchurch Street. The setting of the Conservation Area is also an important part of its significance with regards to views into and out of the Conservation Area.

2. NON-DESIGNATED HERITAGE ASSETS

Renown House 33-34 Bury Street

26. Recognised in the City Planning Officer's Creechurch Conservation Area designation report for its good quality carved stone detail, making an effective contrast with Holland House and forming a strong corner to the bend in the street, Renown House has **MODERATE** architectural and historic significance

Rabbi's House and Vestry, 2 and 4 Heneage Lane

27. Sitting either side of the east elevation onto Heneage Lane of the Grade I Synagogue the red-brick 19th century Rabbi's House and the Vestry are important to the ensemble of religious buildings and have **MODERATELY HIGH** architectural, historic and cultural significance.

Cree House 18-20 Creechurch Lane; Fibi House 22-24 Creechurch Lane; Sugar Bakers' Court; 12-14 and 27-31 Mitre Street

28. A coherent group of unlisted 19th and 20th century brick-built warehouse buildings of generally four storey scale which possess good architectural detailing and proportion, and make an important contribution to the local townscape. They have **MODERATELY HIGH** architectural and historic significance.

IMPACT OF THE PROPOSAL ON HERITAGE ASSETS

Creechurch Conservation Area

29. The proposed scale of development will have a very harmful impact on the character and appearance of the Conservation Area. The planning officer's designation report notes that the existing 31 Bury Street forms the corner with Creechurch Lane and is important in

framing Heneage Lane. Similarly, the height, mass and scale of other post-war buildings in the Conservation Area, such as 33 Creechurch Lane, 5-10 Bury Street, 32-40 Mitre Street, 10-16 Bevis Marks, 71-77, 78-79 and 80 Leadenhall Street and Cunard House are considered to be sympathetic to their context. All these buildings, despite having no particular architectural merit, are noted for maintaining the historic building line and the prevailing scale of street blocks. The existing 31 Bury Street does exactly that.

30. The only existing tall building within the Conservation Area, One Creechurch Place, is included because of its historic association with the site of the Great Synagogue, although the building itself does not contribute positively to the character and appearance of the area. The Planning Officer's report does refer to the 2017 consent (which has been granted a Certificate of Lawful Development) to redevelop 24 Bevis Marks with a 19 storey office building, but it should be noted that this is immediately next to the much taller 70 St Mary Axe, and so immediately in its shadow. The proposed tower at 31 Bury Street has a very different context, next to Holland House, Cunard House and the warehouses in Creechurch lane.

31. The designation report notes that Bury Street forms an obvious division between the more historic granular scale to the east and the much larger and more modern scale of the City Cluster. There is no case whatsoever for allowing a tall building on the north side of Bury Street. The height scale and mass of the proposed tower will overwhelm the Conservation Area, from almost every possible direction. Views 46 and 58 of the applicant's HTVIA illustrates the impact that will be had on Creechurch Lane, Mitre Street, Heneage Lane, Bevis Marks and Bury Street. While it might be argued that some individual views cause less than substantial harm in their own right, the continuum of views down so many streets from within and into the Conservation Area from outside will result in a cumulative impact that causes **substantial harm** to the character and appearance of the Conservation Area. Indeed, were the proposed development to be allowed it would render the designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise. As a precedent it would potentially undermine the ability to preserve and enhance any of the City's conservation areas, and indeed have implications nationwide.

Bevis Marks Synagogue

32. By reason of its height and proximity the proposed tower will overwhelm the Synagogue. The visual and psychological impact on the courtyard would be catastrophic, equally severe as the previously refused scheme. The serious incursion into the open sky views will fundamentally undermine the intrinsic secluded and dignified quality of the space. The loss of light to the interior of the Synagogue is also a major concern. The

impact on the Synagogue and its courtyard will be both tangible and intangible, as explained in the assessment of significance in paragraphs 15 and 16 above.
33. The applicant's HTVIA includes Views 45A and 45B, deemed by the applicant to be of 'medium' sensitivity, and where the impact is described as 'moderate and beneficial'. Such an analysis demonstrates a complete lack of understanding by the applicant of the significance of the Synagogue and its courtyard.
34. The setting of the east elevation of the Synagogue fronting Heneage Lane will also be harmed, being totally dominated by the new tower, although no view is provided of this in the applicant's HTVIA.
35. Overall, the proposals cause **substantial harm** to the significance of the Synagogue and its setting.
36. The harm caused will also do much to spoil Bevis Marks as a potential visitor attraction which in turn will harm the City Corporation's ambitions to increase tourism.

St Katharine Cree

37. No verified view has been provided by the applicant from the south side of Leadenhall Street looking northwards down Creechurch Lane. (View 46 in the HTVIA does not cover this). This important view is flanked on the right by the charming tower of the church, seen against clear sky, and on the left by Cunard House, with the view terminated by the existing 31 Bury Street. The massive height of the proposed tower will radically alter this view and cause a **moderately high** degree of **less than substantial harm** to the setting of St Katharine Cree.
38. It is unclear whether the proposed tower will also impinge into the existing secluded space of the churchyard to the rear of Mitre Street and Creechurch Lane which is surrounded at present by low buildings. No verified view has been provided from the southern side of the churchyard.

St Botolph's

39. Although some of the HTVIA views presented by the applicant show that the tower and spire of St Botolph's Church is already impacted by the 19 storey mass of One Creechurch Place, it is considered that the much greater height and prominence of the proposal, almost immediately behind, will further erode the landmark qualities of St Botolph's. View 38 has been taken from a position where the new tower will arguably be covered by other proposed tall buildings behind. No view has been provided further west along Aldgate which would show that the proposed tower at 31 Bury Street will rise significantly above One Creechurch Place and challenge the landmark quality of St Botolph's. It will cause a **moderate** degree of **less than substantial harm** to the setting of

this Grade I building and will diminish the skyline presence identified in the Protected View SPD.

Holland House

40. The proposal involves radical alterations to the fabric, plan form and integrity of Holland House. The demolition of most of the east elevation, the insertion of a large new staircase, the capping off and enclosure of the internal lightwell and the opening up of its floor plans to link continuously with the new building at 31 Bury Street and the rebuilt Renown House will greatly change and reduce the individual identity of Holland House. The proposals effectively subsume Holland House into one huge floorplate building running across the entire application site. These appear to be major and irreversible changes.

41. The four-storey roof extension is out of proportion with the original five storey building, appearing top heavy. This is clearly apparent in Views 42, 43 and 60 of the applicant's HTVIA.

42. The setting of Holland House is massively affected by the proposed tower. Despite the vertical format of Views 43 and 60 they do not manage to include the full height of the tower. While One Creechurch Place is visible in the existing View 60, the impact of the proposal, immediately adjacent to Holland House, will be far greater.

43. The immediate setting of the south elevation of Holland House will also be severely harmed by the scale and proximity of the new tower at 31 Bury Street. This is shown in the illustrative CGIs Figures 6.6, 6.8 and 6.10 of the applicant's HTVIA Volume 2. The height and scale of the undercroft is completely out of proportion to Holland House, and the existing forecourt between 31 Bury Street and Holland House is substantially reduced in width. View 58 shows how the existing Bury House is sympathetic in scale to Holland House, whereas in the proposal it will appear visually crushed by the overwhelming scale of its neighbours.

44. Overall, the proposals cause **high** degree of **less than substantial harm** to the significance of this designated heritage asset.

Aldgate School

45. The comparatively modest height (19 storeys) of One Creechurch Place is already visible as a backdrop to views of the school from Aldgate, and has a negative impact. View 41 of the HTVIA, looking down Mitre Street, shows how much taller the new tower will be, having an additional negative impact, by increasing the undesirable sense of enclosure and overlooking. It will cause a **minor** degree of **less than substantial harm** to its setting.

2-16 Creechurch Lane

46. The existing massing of 31 Bury Street, occupying the corner with Creechurch Lane, provides a sympathetic scale and context to the five storey scale of 2-16 Creechurch Lane. The setting of these fine warehouse buildings will be adversely affected by the proposed tower which will become an overpowering presence in the street. It will cause a **moderately high** degree of **less than substantial harm** to the setting of these listed buildings.

Tower of London

47. It is acknowledged that Historic England is the heritage body best equipped to comment on the impact of the proposals on the Tower of London World Heritage Site. Several views provided in the applicant's HTVIA clearly show that the proposal will be a serious incursion into the backdrop which will cause harm to the setting of the Tower of London.

48. The applicant's justification that the new tall building will be part of the northern 'foothills' of the City Tower Cluster seems a tenuous and unconvincing argument. Far from softening the existing edge provided by curved form of 30 St Mary Axe (the'Gherkin') the new tower at 31 Bury Street as seen in View 9 makes a very undesirable intrusion into LVMF 10.1A, reducing the prominence of the south-west turret of the White Tower. Views 25, 26, 27, 28 and 30 show how the existing curved edge of 30 St Mary Axe will be negated and exceeded by the new tower, appearing as a taller outlier to the cluster.

49. The HTVIA also provides views from within the precincts of the Tower. View 23, from the Inner Ward, shows how the proposed tower will intrude into the existing clear sky above the east end of the Royal Chapel. View 24 shows the tower rising above 2 Tower Green. View 49 demonstrates that the proposed tower will fill the existing clear gap between the town houses and the tower of the Royal Chapel, a view of 'high sensitivity'. View 51 shows incursion into the existing clear sky above the Watergate.

50. The applicant's assertion that the proposed tower would signify a new 'edge' to the City Tower Cluster is highly contentious; indeed, the opposite is likely. If approved it would likely set a precedent for allowing further towers in the Conservation Area, including for example 33 Creechurch Lane.

Port of London Authority Building 10 Trinity Square

51. Views 28 and 50 of the HTVIA show how the new tower will impinge on the skyline presence of the landmark tower of the PLA Building. It will cause a **moderately high** degree of **less than substantial harm** to this aspect of its heritage significance.

38 St Mary Axe

52. View 55 of the HTVIA shows that the existing clear sky view above the listed 38 St Mary Axe will be infringed by the proposed tower. No other proposed or approved tall buildings are visible in this view from Clerks Place. Owing to the narrow nature of St Mary Axe this is the only long view of the frontage. The proposal will cause a **moderately low** degree of **less than substantial harm** to the setting of this designated heritage asset.

Lloyd's Avenue Conservation Area

53. The Lloyd's Avenue Conservation Area Character Summary and Management Strategy SPD, adopted in January 2012, identifies various views within the Conservation Area which are important to its character and appearance and its heritage significance : "The double curve of Lloyd's Avenue creates a series of subtly different views north along Lloyd's Avenue, with each building viewed obliquely and collectively in groups. At the top of the street, Furness House, 105-106 Fenchurch Street, has a dominant presence and terminates the view with its imposing central pedimented bay being gradually revealed upon approach".

54. Views 40 and 52 in the applicant's HTVIA show that the proposed tower at 31 Bury Street will form a very prominent backdrop to the existing continuum of views. It will appear as an intrusive and alien element in a remarkably unified existing townscape and will cause a **moderate** degree of **less than substantial harm** to the setting of the Lloyd's Avenue Conservation Area.

Renown House 33-34 Bury Street

55. The proposal involves the retention of only the two stone street facades of Renown House. The existing mansard roof, dormer windows, prominent chimney stack and the complete interior of the building are to be demolished. The proposed additional vertical floor harms the architectural proportions and balance of the original design and appears crudely detailed. The ungainly proportions of the proposal are apparent in View 59 of the HTVIA, seen from Cunard Place. The additional mansard and dormers are also poorly detailed, unsympathetic to the Edwardian character of the building. New floor levels are inserted to line through with the rest of the development and will result in bulkheads crossing the existing window openings, as shown in Figures 6.3, 6.5. 6.11 and 6.12 of the HTVIA.

56. The setting of Renown House will also be overwhelmed by the roof extensions to Holland House and the height of the tower. This harmful impact is illustrated in Figure 6.1 and Views 42 and 60 of the applicant's HTVIA, and although they do no show the full height of the tower. Views 42 and 59 show how the existing chimney stack and pots of Renown House are currently seen against the sky, something that is completely lost in the

proposal. The scheme will cause a **high** degree of **less than substantial harm** to this non-designated heritage asset.

Rabbi's House and Vestry, 2 and 4 Heneage Lane

57. The massive scale of the proposed tower at the southern end of Heneage Lane will dominate the townscape of Heneage Lane whose existing modest scale is an inherent part of its charm. The proposal will result in a **moderately high** degree of **less than substantial harm** to these non-designated heritage assets which front onto Heneage Lane either side of the east end of the Synagogue.

Cree House, 18-20 Creechurch Lane; Fibi House, 22-24 Creechurch Lane; Sugar Bakers' Court; 12-14 and 27-31 Mitre Street

58. This important group of late 19th century warehouses sits directly opposite and very close to the existing 31 Bury Street which at present is a consistent scale with its neighbours. While View 41 of the HTVIA is taken from Leadenhall Street, no closer view down Mitre Street has been provided which would show how the existing 31 Bury Street is an entirely appropriate scale relating to the Mitre Street warehouses. The massive height and scale of the proposed tower and its base will dominate and overpower the existing townscape and will result in a **moderately high** degree of **less than substantial harm** to the setting of these non-designated heritage assets.

COMPLIANCE WITH POLICY

59. It is considered that there is clear conflict with the statutory duties to protect the significance of listed buildings and to preserve and enhance the character and appearance of the Creechurch Conservation Area.
60. The proposal breaches Policy D9 of the London Plan which require the protection of heritage assets
61. The proposal conflicts with Local Plan policies to conserve and enhance the City's conservation areas. The proposal conflicts with Local Plan Policy CS14 (2) which states that tall buildings are not appropriate within conservation areas. While the draft City Plan 2040 proposes to change that policy it can be given very little weight at this stage.
62. The proposal conflicts with Local Plan Policy CS13 (2) to protect City landmarks and skyline features.
63. The proposals conflict with policies that seek to protect the setting of the Tower of London World Heritage Site.

ASSESSMENT OF HERITAGE BENEFITS PROPOSED BY THE APPLICANT

64. The applicant suggest that a number of public benefits will be provided by the development including some that are claimed to be heritage benefits. These are addressed and evaluated below.

65. Repairs and renovations are proposed to internal and external features of Holland House. This should all be regarded as routine repair and upgrading which any responsible owner of a listed building would automatically undertake. The assertion in Paragraph 2.32 of the applicant's Planning Statement that repairs to the faience tiles of Holland House can only be viably funded and delivered through the wider redevelopment of the site seems fanciful and hard to prove. The £ 4 million cost estimated by the applicant for faience repairs, window upgrades and renovation of internal spaces must be tiny fraction of the budget for the extensive works and extensions to Holland House, let along to the scheme as a whole.

66. The applicant claims to be reinstating the southern arm of the original historic Heneage Lane. The proposed ground floor plan shows that the new retail arcade running beneath the new tower does not in fact line up with Heneage Lane, but dog-legs to the east and is at a different angle. The original medieval Heneage Lane ran dead straight from Bevis Marks to Bury Street. No clear view through from the north end of Heneage Lane would be provided by the proposal. Furthermore, the applicant states that it will be gated and closed at night.

67. Similarly, the proposed reinstatement of James Court is both historically inaccurate and misleading. The reality of the proposal is a two-storey undercroft or arcade below the tower, separated from the street by the supporting structure of the tower. It is likely to a singularly unattractive place for the general public. It significantly reduces the size of the existing open courtyard between the existing 31 Bury Street and Holland House, which more accurately sits on the original site of James Court. The bombastic architectural treatment of the new building greatly changes the existing pedestrian townscape of narrow streets and pavements that characterise the area. The height and proportion of this undercroft and its columns is completely out of scale with Holland House. There are no heritage benefits provided here, only harm existing heritage assets.

68. Proposed works to the public highway are outside the ownership of the applicant and are the remit of the City Corporation. Demolition and construction work is likely to severely damage the existing pavements and carriageways, and the developer would normally be expected to pay for their reinstatement to the City's required standards without this being considered a public benefit.

69. The applicant claims that the design of the new tower will be of exceptional quality which will enhance the setting of Holland House, but there is little in the submitted

drawings to support this. No amount of modelling or material finishes can overcome the entirely inappropriate scale and massing of the proposed new building. In any event good design in a fundamental requirement of all development and is not in itself a public benefit.

BALANCING HARM AGAINST PUBLIC BENEFIT

70. Paragraph 205 of NPPF states that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance". Many of the heritage assets affected by the proposals are of the highest possible heritage significance and their conservation must therefore be accorded very great weight. Although the applicant repeated states that great weight should be given to the postulated public benefits, there is nothing in NPPF to support that.

71. Paragraph 206 states that any harm to the significance of a designated heritage asset, including development within its setting, should require clear and convincing justification. Substantial harm to grade II buildings should be exceptional; substantial harm to Grade I buildings should be wholly exceptional.

72. Paragraph 207 states that where development will lead to substantial harm to a designated heritage asset, consent should be refused unless it can be demonstrated that the substantial harm is necessary to achieve the substantial public benefits that outweigh that harm.

73. Paragraph 208 states that where development will lead to less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of that proposal.

74. It is considered that the cumulative and high degree of harm to a such a large and widespread number of designated heritage assets far outweighs the alleged public benefits that the applicant claims will arise from the proposed development.

CONCLUSION

75. Paragraph 203 of NPPF requires Local Planning Authorities when determining applications to take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation: b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality: and c) the desirability of new development making a positive contribution to local character and distinctiveness.

76. The proposed development fails to meet any of these criteria. As concluded above, the scheme is considered to cause substantial harm to the Creechurch Lane Conservation Area and to the Bevis Marks Synagogue. In addition there are multiple cases of less than substantial harm to a wide range of designated and undesignated heritage assets, some of the very highest significance including the Tower of London World Heritage Site. Cumulatively the degree of harm is serious, and must be given very great weight. The public benefits claimed by the applicant, including alleged heritage benefits, go nowhere near to outweighing the harm.
77. There were very good reasons for refusing the previous proposals for 31 Bury Street, namely the adverse impact on Bevis Marks Synagogue and the protected views of the Tower of London. These reasons continue to apply to the current scheme, augmented by the additional harm now caused to the new Creechurch Conservation Area, Holland House and Renown House. It is strongly recommended that the planning and listed building consent applications be refused.

22nd April 2024

Alec Forshaw, together with Esther Robinson, was the author of the Option Three proposal for the designation of Creechurch Conservation Area, the option that was eventually approved by the City Corporation. He was Principal Conservation and Design Officer for the London Borough of Islington, where he worked from 1975 – 2007. He has written widely on historical and architectural matters, including *New City, Contemporary Architecture in the City of London* (2013), *The Barbican, Architecture and Light* (2015), and *Smithfield, Past, Present and Future* (2015). He gave evidence on behalf of SAVE Britain's Heritage in support of the City of London's refusal of planning and listed building consent at the Custom House Public Inquiry in February 2022.

Appendix 2: Letter from Rabbi Joseph Dweck

the S&PHARDI community ק"ק שער השמים

Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

Centrality of Sky View at Bevis Marks to Religious Services and Heritage

Given the concerning plight under which Bevis Marks Synagogue, the oldest continuously used synagogue in the world finds itself, I offer here some core points based in millennia-old Jewish law that is central to the synagogue's function and vitality.

1. The spiritual significance of the sky view at Bevis Marks has been inscribed into the material fabric of the building. In Hebrew, the synagogue is known as Sha'ar Hashamayim (Gate of Heaven). These words – Sha'ar Hashamayim - are carved in stone above the entrance gate, and painted above the synagogue's doors. They originate in the Biblical episode of Jacob's dream of a ladder with angles ascending and descending. Upon waking Jacob exclaimed: 'How awesome is this place, it is none other than the House of G-d and the Gate of Heaven'.[1] For this reason 'Gate of Heaven' is considered a euphemism for a 'House of G-d': Adjacent Aldgate and Bishopgate may have been the gates into the City of London, but the synagogue was the 'Gate of Heaven' for the City's Jews. The experience of 'heaven' is currently felt upon entering the quiet courtyard of Bevis Marks Synagogue, and seeing the sky around it, particularly as it frames the synagogue itself to its immediate south.
2. The sky view in the courtyard at Bevis Marks serves important ritual purpose as the sky view is central to Jewish practice. Jews are always looking up in a sense, to judge their religious timings and rhythms. One which occurs weekly is the Sabbath. The Sabbath does not officially end at any specific time on the clock per se (it was kept for generations before the invention of any clock). Rather, it is determined ended when the average person can see three medium sized stars in the sky[2]. While we do tend to rely on the clock when it is cloudy out, it is still very much part of our conscious inspection regarding the sabbath times. This timing is central for many other aspects of ritual and worship. For example, reciting the *Shema Yisrael* which is an obligation every evening must be done only after 3 medium sized stars are seen in the sky[3].
3. Similarly, the beginning of each new Jewish (lunar) month is marked by the appearance of the new moon. Each month, about a week after seeing the new moon, we then say a

[1] Genesis 28:16-17

[2] BT, Shabbat, 35b; Maimonides, MT, Shabbat, 5:4; Shulhan Arukkh, Orah Haim, 235:1.

[3] MT, Keriat Shema, 1:9; Shulhan Arukh 235:1.

the S&PHARDI community ק"ק שער השמים

Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

4. special blessing over the new moon[4]. This is done by going outside and finding the moon in the sky in order to say the prayers. If there is considerable obstruction it renders it impossible to perform this monthly ritual. We pray that as the moon steadily grows more and more full, so should the Jewish people, and so too we should be renewed just as the moon is constantly renewed. If there is constant physical obstruction to the sight of the moon from the synagogue grounds it would severely affect this monthly ritual and cause a great lack in the normal and usual synagogue services. Should buildings block out views of the eastern and southern sky, this ritual would be lost to the synagogue community.
5. Importantly, the sky view is critical to ensuring that enough daylight reaches the interior of the synagogue to enable the community to pray there even on dark winter days, and to retain the existing spiritual qualities of the building. The reading of a large quantity of printed texts by all present is intrinsic to Jewish worship and light levels must be maintained to enable this critical ability.
6. Finally, in general windows with their sky views are essential to a synagogue. This is expressed primarily in the Babylonian Talmud (Berakhot, 31a) in its referencing of verse 6:11 from the book of Daniel. The Talmud states: 'Rabbi Ḥiyya bar Abba said: One should always pray in a house with windows, as it is stated regarding Daniel: "And when Daniel knew that the writing was signed, he went to his house. In his attic there were open windows facing Jerusalem, and three times a day he knelt upon his knees and prayed and gave thanks before his God, just as he had done before." Likewise, the pre-eminent Jewish legal authority Rabbi Yosef Karo (Bet Yosef, OH:90) asserted that windows enable one to see the sky, look heavenward during prayer, and experience humility. If the windows are all obstructed it shuts the synagogue away from the outside world and considerably damages the entire environment and ambience that is meant for a synagogue.
7. This requirement to pray in a house with windows further reflects the fact that the observance of Jewish rituals is shaped by the positions of the sun and moon in the sky across the day, month and year. For example, Jewish prayer times are determined by the daily course of the sun: its journey from east to west over the southern horizon determines the times of our prayers, and is the inspiration for much of our liturgy. For this reason, the morning service (Shahrit) begins with the blessing, 'Blessed are you G-d who is sovereign over the universe, who fashions light and creates darkness…who brings light over all of the land and refreshes creation each day…Blessed are you G-d who creates the luminaries.' Later in the morning, when light currently shines into our

[4] BT, Sanhedrin, 42a; MT, Berakhot, 10:16; SA, Orah Haim, 426

the S&P HARDI community ק"ק שער השמים

Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

8. courtyard and penetrates into the synagogue, it casts its glow across the pews, creating warmth on the faces of congregants, and lifting their thoughts skyward. On Yom Kippur, the darkening light and the glow of candles in the evening is a sign that the Gates of Mercy are about to close. In this way, the changing presence of light in the synagogue is intimately connected to the spiritual experience of worshippers. Any change to the current sky view would have profound implications for the religious value of the synagogue as a spiritual space and house of Jewish prayer.
9. Originally, the courtyard on three sides ensured that the synagogue windows were completely unobstructed, maximising the daylight admitted. Since then, the construction of higher buildings in the surrounding area which encroach upon the synagogue's sky view has reduced the amount of direct sunlight and reflected light entering the synagogue through these windows, significantly darkening the interior. Nevertheless, when looking out from the synagogue gallery windows one can still see the sky on both sides. Any further encroachment on the synagogue sky view is likely to make that impossible, blocking direct light and reducing the amount of reflected light that reaches the interior to a dangerously low level that threatens the synagogue's ability to function.
10. Finally, Circumcision is a foundational ritual in Judaism since only after he is circumcised is a Jewish boy considered to have joined the Jewish community: it is a medical procedure carried out on a baby's eighth day by a trained professional called a mohel. Ample light is essential to perform this ritual safely, but recent testimony from mohels who have conducted circumcisions in Bevis Marks confirms that any further reduction to light levels would render this impossible. Bevis Marks Synagogue contains two historic circumcision chairs from the seventeenth and eighteenth centuries, testifying to the long history of circumcision here. Ending the practice of circumcision at Bevis Marks would mark a significant rupture in three hundred years of tradition, harming the synagogue's significance as a place of worship and communal life.

As it is clearly evident, the above is just a selection of a vast legal system that is dependent on a profound connection with the observation of the celestial bodies and the movement of the earth in space and around the sun. For this to be cut off or obstructed, terribly damages and severely inhibits the *élan vital* of the community.

Joseph Dweck

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Begum, Shupi

From: Gill Othen [redacted]
Sent: 14 March 2024 15:24
To: Ipaburystreet
Subject: Bury House 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I note with interest that revised plans have been submitted with respect to the demolition of Bury House, the alteration of the adjoining listed building, Holland House, and the intention to replace the former with a large building. At a time when the perils of antisemitism are so much in the news, are such actions, which could irreparably damage the functioning of the oldest synagogue in the country, really wise? The City of London is tasked with protecting surviving buildings of historic or architectural note; allowing the proposed works seems to me to be flying in the face of such duties.

Moreover, at a time when office space supply is overabundant, just how necessary is this building? Rather than contributing to London's function as a business and financial hub, would it not rather suck the life out of existing properties of that function?

Finally, there is a general duty on the City of London to proceed with an awareness of the implications on sustainability, resource usage and climate change/net zero policy. Is there any evidence at all that the proposed changes will provide any sort of benefit in those areas, or, rather, will they not significantly interfere with the City's responsibilities in those terms?

For all of the above reasons, I wish to express my opposition to the proposed changes.

Yours faithfully,

Gillian M Othen (Mrs)
49, Windy Arbour,
Kenilworth,
Warwickshire.
CV8 2BB

Begum, Shupi

From: Linda Baharier [redacted]
Sent: 23 April 2024 14:39
To: lpaburystreet
Cc: Tastsoglou, Anna; Zdunik, Rafal
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear

Shupi Begum
My Full address is
1, Castlehill Cottages
Outwood Lane
Bletchingley
RH1 4LR

But my family has an intrest in Bevis Marks going back before 1741, due to marriages, circumsions, namings etc
Yours faithfully
Linda Baharier

On Tuesday, 23 April 2024 at 13:48:53 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Linda Baharier,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Linda Baharier [redacted]
Sent: Thursday, March 14, 2024 3:08 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

I toally obect to the demolition and erection of a 43 storey building blocking ligh and totally inaproprate

to this area and any changes to a listed building

Linda Baharier

On Thursday, 14 March 2024, 14:42:56 GMT, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou

Environment Department

City of London

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Begum, Shupi

From: Amos Schonfield [redacted]
Sent: 23 April 2024 15:09
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC
Attachments: image002.jpg

THIS IS AN EXTERNAL EMAIL

Of course

Amos Schonfield
8 Edward's Ln
London N16 0JJ

Best,

Amos

On Tue, 23 Apr 2024, 14:33 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Amos Schonfield,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Amos Schonfield [redacted]
Sent: Friday, March 15, 2024 2:13 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Anna & team,

Thank you for sharing this notification. It feels somewhat like a groundhog day experience, as I believe that this is the third time I have felt the need to object to building that will disturb, disrupt, and ultimately destroy the Bevis Marks community. My parents were married at Bevis Marks Synagogue, me and my brothers received our bar mitzvahs (coming of age) there, and recently I was able to be part of the baby-naming service for my niece. My family's story is only one of thousands whose lives have been touched by this community. I understand that structurally the building, a listed building, will be unaffected by this development. However, this synagogue has a cultural heritage that is largely unique in global Jewry, and will only survive if the community itself can survive. This community has been through a lot, not least surviving a terror attack in the 1990s. It is all the more reason that it is so distressing that the City of London would be so willing to jeopardise its only synagogue community in this way.

I don't want to be a member of a museum. I want to be a member of a living, breathing, Jewish community. Is yet another skyscraper - when so many are lying empty across the city - worth the risk of destroying Bevis Marks?

Best,

Amos

On Thu, Mar 14, 2024 at 2:39 PM lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Consultee/Contributor,
>
> Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)
>
> Reply with your comments to lpaburystreet@cityoflondon.gov.uk
>
> Kind Regards,
>
> Planning Administration
>
> On behalf of
>
> Anna Tastsoglou
>
> Environment Department
>
> City of London
>
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--

Amos Schonfield

Founder, Our Second Home

www.oursecondhome.org.uk

Find us on Facebook, Twitter & Instagram

Jonathan Solomons

1, Balcon Way, Borehamwood, Hertfordshire WD6 5DQ

22 March 2024

Dear Ms Tastsoglou,

I am writing to you to formally **object** to planning application 24/00021/FULEIA.

I am a regular worshiper at Bevis Marks Synagogue and my family history goes back to its opening over 320 years ago. I have been actively involved in the fight for protections and particular in relation to this building for over five years. You will be aware of the history of this building, especially that it was denied planning permission in a historic vote of the Planning and Transportation Committee in 2022. Since then, the synagogue has been actively working with the City of London to ensure that a Conservation Area that will protect the synagogue was implemented.

It is therefore both shocking and horrifying to see that this application has been brought forward. The plan is practically identical to the one previously submitted and would not have been allowed to be built within a conservation area under the current guidelines. It is incredibly transparent, that the City of London is proposing a change to their Local Plan policies in what appears to be a brazen attempt to allow this building to evade the restrictions that would previously have prevented its construction.

This enormous building will overshadow the synagogue courtyard, impacting on the religious and heritage use of the site. I personally have celebrated many community and personal events in the space including part of my own wedding. It is a vital part of our communities shared space and history and it a travesty that this kind of activity will not be possible should this building be allowed to go ahead.

The EQIA erroneously identifies no disproportionate impact based on religion or belief due to the particular need for light and outside activity that is an inherent aspect of the Jewish faith.

It is impossible to believe that such an enormous building would be contemplated near an important Christian house of worship or other important non-Jewish landmark. At a time when antisemitism is at an all time high, the fact that the City is contemplating placing at risk their most important Jewish site must be reconsidered.

Other objections will cover the significant impact that massively reducing light will have on worship and the operation of the new visitors' centre. However, the fact that such a development can be even considered when it has been rejected before and is now being proposed within a Conservation Area must and will be challenged.

I urge in the strongest terms that this planning application be rejected, as it has been previously.

Yours sincerely

[redacted]

Jonathan Solomons

Begum, Shupi

From: Harold Shupak [redacted]
Sent: 28 March 2024 10:24
To: Ipaburystreet
Subject: Your Refs: 24/00021/FULEIA (Planning Permission) and 2400011/LBC (Listed Building Consent)

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I refer to the letter dated 14 March 2024 from Anna Tastsoglou of your Development Division relating to the applications for Planning Permission and Listed Building Consent to which your above-mentioned references relate.

I note from Anna Tastsoglou's letter that the application for Planning Permission is for development which does not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated,

I also note from Anna Tastsoglou's letter that not only is the proposal considered to affect a Building of Special Architectural or Historic Interest but that it is also considered to affect the setting of a listed building and the character and appearance of the Creechurch Conservation Area.

Save Britain's Heritage's detailed report dated 1 November 2023 in relation to the then proposed Creechurch Conservation Area included the following statements specifically referring to the Bevis Marks Synagogue under the heading "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 (sic) immediately adjacent on Henage Lane."

"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 1 listing and the conservation area is to be enforceable."

In the light of all the above, I object to both the application for Planning Permission and the application for Listed Building Consent and I consider that the applications for Planning Permission and Listed Building Consent should be refused.

Please acknowledge receipt of this e-mail and forward it to the members of the Planning Committee.

Regards.

Harold Shupak

2, Sunningdale Lodge
Stonegrove
Edgware HA8 7SY

Begum, Shupi

From: Lee Moreland [redacted]
Sent: 31 March 2024 17:13
To: lpaburystreet
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Madam,

Thank you for the opportunity to provide feedback on this planning application.

I am supportive of the planning application for the following reasons

- to support the redevelopment and future landscape of the City of London
- Houndsditch and surrounding areas are full of dilapidated buildings of questionable architectural and historical promise
- the planning application has been revised to accommodate the previous objections concerning a building of special interest

Thank you

Lee S Moreland
Flat 9 St Lukes Court
124-126 Tooley St, London SE1 2TU
[redacted]

On Thu, 14 Mar 2024 at 14:39, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Consultee/Contributor,
>
> Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)
>
> Reply with your comments to lpaburystreet@cityoflondon.gov.uk
>
> Kind Regards,
>
> Planning Administration
>
> On behalf of

Anna Tastsoglou

Environment Department

City of London

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Begum, Shupi

From: Barbara Simon [redacted]
Sent: 24 April 2024 14:22
To: lpaburystreet
Subject: Re: Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

FYI
My full address is
8B Garlinge Road
London NW2 3TR

Hope this is sufficient.

Barbara Simon (Ms)
[redacted]
Sent from my iPhone

> On 24 Apr 2024, at 13:54, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Barbara Simon,
>
>
> Thank you for your email. I can confirm receipt of your objecOon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecOon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaOon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
>
> Kind Regards
> Shupi Begum
>
>
>
>
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaOon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hΣps://gbr01.safelinks.protecOon.outlook.com/?url=hΣp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Ced50a3af1ccf41af3a3e08dc6461986d%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638495617526960614%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=fedLwZSPt6j9mC4Au1HCcKZYIYc9D0EPXMRwGlMuKMM%3D&reserved=0

> Juliemma McLoughlin
> Execu ve Director Environment
>
>
>
> -----Original Message-----
> From: Barbara Simon [redacted]
> Sent: Monday, March 25, 2024 3:46 PM
> To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
> Subject: Consulta on: 24/00021/FULEIA and 24/00011/LBC
>
> THIS IS AN EXTERNAL EMAIL
>
>
> Environments Department
> City of London
>
> Dear Sirs
>
> Will this never end with property companies a empng to interfere with the peace and stability of our precious building, the historic synagogue Bevis Marks? Would they s l persist if their plans were so close to St Paul's cathedral? For us that have some Spanish and Portuguese Sephardi heritage, Bevis Marks is comparable. So again, I do hope that this latest proposal, as has all previous ones, is rejected.
>
> Best wishes
>
> Barbara Simon
>
> Sent from my iPad
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> Please note that in so far as the City of London falls within the
> scope of the Freedom of Informa on Act 2000 or the Environmental
> Informa on Regula ons 2004, it may need to disclose this e-mail.
> Website:
> h ps://gbr01.safelinks.protec on.outlook.com/?url=h p%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Ced50a3af1ccf41af3a3e08dc6461986d%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638495617526970527%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=F3zZKoqWGOULTG0PcCipr5BS8QCwAv1R7buBijRAU38%3D&reserved=0

Begum, Shupi

From: Jeantique she/her [redacted]
Sent: 24 April 2024 14:11
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Application (24/00021/FULEIA)

THIS IS AN EXTERNAL EMAIL

Hiya, sure, please can you make sure my details are removed from the planning report. My address is [redacted]
Thanks very much,
Jeantique

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 24 April 2024 12:56
To: [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: FW: Application (24/00021/FULEIA)

Dear Jeantique Hommel,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

-----Original Message-----
From: Jeantique she/her [redacted]
Sent: Monday, March 25, 2024 3:08 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Application (24/00021/FULEIA)

THIS IS AN EXTERNAL EMAIL

To whom it may concern

I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Especially considering this extremely sensitive time when British Jews are feeling completely isolated in British society as it is.

Thank you very much,
Jeantique Hommel

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From:	Tastsoglou, Anna
To:	Watson, Davis
Cc:	Zdunik, Rafal
Subject:	FW: Do NOT permit the contruction of a 40+ story building alongside the Bevis Marks Synagogue
Date:	02 April 2024 08:13:52
Attachments:	image002.png

Hi Davis,

Please see below representation regarding Bury Street. Can this please be uploaded on the file of the application (24/00021/FULEIA)?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: John Comaroff [redacted]
Sent: Monday, April 1, 2024 4:31 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris [redacted]
Subject: Do NOT permit the contruction of a 40+ story building alongside the Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

I write to protest, in the strongest possible terms, permission for the construction of a forty-something story building virtually adjacent to the Bevis Marks Synagogue. You are well aware of the historical significance of this synagogue, not just to the Jewish population of London and to

World Jewry, but to the heritage of London as a British and Global city. No need to repeat any of that. But, in light of it, in light of respect for Jews everywhere, in light of respect for the history of London, allowing the erection of a building that would dwarf the synagogue, cut is light, and render its urban geography literally monstrous, it is hard to understand why the plan is being entertained at all. I believe that a version of the plans, slightly higher, were rejected some time back. What has changed -- other than the spurious reduction of three floors from forty-eight -- to make the decision more acceptable now?

I urge you to protect the heritage of your London, one of the world's most historica, most globally significant cities, to recognize and respect the Jewish community that has contributed so much to its history and its contemporary glory, and refuse permission for the construction of the planned building.

Kind regards,

John Comaroff

High K. Foster Professor, Anthropology and African and African American Studies
Harvard University
Cambridge, MA 02138
USA



Begum, Shupi

From: Marlena Schmool [redacted]
Sent: 24 April 2024 14:51
To: lpaburystreet
Subject: Re: Planning application number: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Thank you for your email.

My postal address is:

11 Defoe House,
Barbican,
London EC2Y 8DN.

Marlena Schmool

> On 24 Apr 2024, at 14:44, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Marlena Schmool,
>
> Thank you for your email. I can confirm receipt of your objecOon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecOon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaOon CommiSee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaOon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hSps://gbr01.safelinks.protecOon.outlook.com/?url=hSp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Cï b5eb6bf8424f0042f308dc64658905%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638495634445596819%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=FV3vXr4CrGS7fAa%2F3LfNHvMc1LsqolPUkQHO0KppLBA%3D&reserved=0
> Juliemma McLoughlin
> ExecuOve Director Environment
>
> -----Original Message-----
> From: Marlena Schmool [redacted]
> Sent: Monday, April 1, 2024 12:08 PM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: Planning applicaOon number: 24/00021/FULEIA.

>
> THIS IS AN EXTERNAL EMAIL
>
>
> Dear Ms Tastsoglou,
>
> I am wri ng, as a resident of the City of London and as a member of, and weekly a ender at, Bevis Marks to object extremely strongly to these plans. I am more than saddened and much angered that this is the second me I am having to do so. The current applica on is virtually the same as the previous one an so all previous objec ons are appropriate.
>
> It seems to me that I cannot trust the Corpora on to keep to its own decisions and processes. Can the Corpora on not wait un l more has been done to iden fy loca ons for tall buildings? It would provide a breathing space to take into account the general commercial and social changes that are currently confron ng the City. Surely these should more greatly inform responses to planning applica ons and issues over at least the coming decade.
>
> As many people explained in rela on to the previous applica on, a tower this high would totally swamp the synagogue. It would cast a shadow over both the synagogue and the courtyard. I know from personal experience that this would make it extremely difficult to read prayers at certain places inside the building. Bevis Marks is not simply 'a historic site'; it is also a living community. But the way it is being treated seems to ignore this fact. The developers' presenta on simply 'listed and cked a number of boxes' that are found on all proposals. There is nothing specifically related to the par cular character of what they themselves recognised to be a historic quarter. Nor is there any recogni on of the fact that that the synagogue is within a Conserva on Area.
>
> Please refuse this applica on.
>
> Yours sincerely,
> Marlena Schmool
>
>
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> Informa on Regula ons 2004, it may need to disclose this e-mail.
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> h ps://gbr01.safelinks.protec on.outlook.com/?url=h p%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7C b5eb6bf8424f0042f308dc64658905%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638495634445606391%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=St%2Brt%2BJgKeZq6bBktbf1y3U54g56tj1RDpT6vUjU9%2Fk%3D&reserved=0

Begum, Shupi

From: Frances Flaxington [redacted]
Sent: 29 April 2024 09:05
To: lpaburystreet
Subject: Re: Bevis Marks: concern about new proposal (Tower)

THIS IS AN EXTERNAL EMAIL

B47 Parliament View
1 Albert Embankment
SE17XL

Frances
[redacted]

> On 29 Apr 2024, at 08:51, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Frances and Lee Flaxington,
>
> Thank you for your email. I can confirm receipt of your objecƟon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecƟon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaƟon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaƟon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hΣps://gbr01.safelinks.protecƟon.outlook.com/?url=hΣp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7C3809818c5e694c1dcb6908dc6823105f%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638499747017123809%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=0wt2lxtXMFJ1CtOrEdhMseihpofc4qfc6IBevĭ %2Bhk%3D&reserved=0
> Juliemma McLoughlin
> ExecuƟve Director Environment
>
>
> -----Original Message-----
> From: Frances Flaxington [redacted]
> Sent: Tuesday, April 9, 2024 11:40 AM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: Bevis Marks: concern about new proposal (Tower)
>
> THIS IS AN EXTERNAL EMAIL

>
>
> Hello Anna,
> We understand that there is a proposal to build a 45 storey tower, a building that would overshadow this historic synagogue. As I'm sure you are aware the synagogue is a building of significant historic and cultural significance.
>
> It is hard to understand that such a building would even be considered if it was next to St Paul's cathedral, so why is the impact on this synagogue not resulting in an immediate dismissal of the proposal?
> Can we highlight concerns in particular about the impact on the southern sky view and the reduction of natural light.
> We would also like to ask that as the development site is within the Creechurch Conservation Area isn't it it the case that the proposal is in direct conflict with the statutory development plan?
> We understand that the proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.
> We hope that serious consideration is given to the negative impact on this historic synagogue in making a decision.
>
> Frances and Lee Flaxington
> [redacted]
>
>
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> https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7C3809818c5e694c1dcb6908dc6823105f%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638499747017132186%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=rfUXgCPO%2BMBcpvKugt7UmtRwIzJSXvY%2B8nbQEPnGXKY%3D&reserved=0

Begum, Shupi

From: BeverleyL[redacted]
Sent: 29 April 2024 10:19
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC [OBJECTION]

THIS IS AN EXTERNAL EMAIL

Dear Shupi,

Thank you for your email. I am happy to provide my address:

Beverley Lawrence
9 Oak Farm Drive
Little Downham
Ely
Cambridgeshire CB6 2EA

Kind regards,

Beverley Lawrence (Freeman of the City of London)

On Monday, 29 April 2024 at 09:05:47 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Beverley Lawrence,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: BeverleyL [redacted]
Sent: Tuesday, April 9, 2024 7:50 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC [OBJECTION]

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Thank you for your email.

I write as a Freeman of the City of London, and as a regular visitor to Bevis Marks Synagogue, to register my objection to yet another proposed development on the doorstep of this Grade-I listed building.

A Conservation Area has already been agreed to protect Bevis Marks Synagogue, so I am dismayed that this new proposal is being considered, particularly after its refusal two years ago. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-I listed building. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. Additionally,

there are concerns that construction of this tower could potentially weaken the foundations of the synagogue, and will create noise, mess and disruption for the community.

Bevis Marks Synagogue was built in 1701, and my family worshipped there for generations. It is the ONLY non-Christian place of worship in the City, and recent excavations have shown the site to be of great historical importance. Please protect this wonderful building instead of seeking to destroy it. Do not allow it to become the victim of cultural vandalism.

I urge you to refuse this application.

Yours sincerely,

Mrs Beverley Lawrence

On Thursday, 14 March 2024 at 14:39:17 GMT, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou

Environment Department

City of London

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Begum, Shupi

From: Stephen Gayer [redacted]
Sent: 29 April 2024 13:30
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Reference - 24/00021/FULEIA - Bury House proposal - Objection

THIS IS AN EXTERNAL EMAIL

Apologies for omitting my address. It is as follows: 1 Burnt House, Pudding Lane, Chigwell IG7 6BY

Regards
Stephen Gayer

On 29 Apr 2024, at 13:27, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Stephen Gayer,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Stephen Gayer [redacted]
Sent: Tuesday, April 9, 2024 6:54 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Reference - 24/00021/FULEIA - Bury House proposal - Objection

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou

I again find myself writing to express my serious concerns about development proposals that will, if approved, have a devastating impact on the historic Bevis Marks Synagogue.

A 45 storey tower would completely overshadow the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. To the Jewish community this is the equivalent of Westminster Abbey or St Paul's Cathedral and as such should be afforded the same protection.

It would destroy the southern sky view, which is an essential part of the setting of the synagogue and would impact on religious practices that require a view of the sky. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.

The development site is within the Creechurch Conservation Area and whilst the developers may feel that they are providing planning benefits that outweigh the harm to the synagogue, this is simply not the case. The impact on the Synagogue would be catastrophic.

The existing building at 31 Bury Street is capable of being refurbished to provide good service for many more years. The proposed replacement building would damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. The City Corporation has recognised the importance of the synagogue, and should therefore reflect this by providing it with ongoing protection. It should be made clear

to the developers that it will not tolerate unsuitable redevelopment that directly impacts the building.

Thank you

Stephen Gayer MRICS

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Begum, Shupi

From: Ruth Hart [redacted]
Sent: 24 April 2024 18:40
To: lpaburystreet
Subject: Re: Objection

THIS IS AN EXTERNAL EMAIL

42 The Grove
Edgware HA8 9QB

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 24 April 2024 15:14
To: Ruth Hart [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Objection

Dear Ruth Hart,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Ruth Hart [redacted]
Sent: Tuesday, April 2, 2024 8:46 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Objection

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am the Deputy for Bournemouth Reform Synagogue and my objection to the proposal is in a communal as well as personal capacity.

The plans obviously exclude a number of buildings in future from natural light, which is not good for the physical or mental well-being of any residents and workers in the area. Concerning Bevis Marks Synagogue, the building is of historic importance to all faiths as the oldest place of continuous Jewish worship in the UK, but it is also a place of regular worship today. The obstruction of natural light restricts the ability of Jews to fulfil certain religious obligations, e.g. sunset and the appearance of 3 stars to mark the beginning and end of Shabbat and holidays; the appearance of the new moon to determine the dates of said holidays. The "settling area", far from extending protection to the synagogue and surroundings, decreases it.

Given the current atmosphere and the incidence of antisemitism, it would be an act of good faith towards the Jewish population of London and a good example of community cohesion if the number of storeys of new buildings were reduced, and, given the decreasing numbers of people who are working in offices, it would also be a good example of protection for the environment and our shared heritage.

Yours faithfully,

Ruth Hart

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Begum, Shupi

From: Denise Owen [redacted]
Sent: 24 April 2024 15:43
To: lpaburystreet
Subject: Re:
Attachments: image002.jpg

THIS IS AN EXTERNAL EMAIL

My address is
St John's Vicarage
Mossley
OL5 0SA

On Wed, 24 Apr 2024, 14:19 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Denise Owen,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Denise Owen [redacted]
Sent: Friday, March 29, 2024 6:12 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject:

THIS IS AN EXTERNAL EMAIL

No, absolutely not

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From:	Dorothy Lampert
To:	lpaburystreet
Cc:	Tastsoglou, Anna
Subject:	RE: Comments for Planning Application 24/00061/
Date:	25 April 2024 12:34:27

THIS IS AN EXTERNAL EMAIL

Thank you for your email. Apologies – my name Dorothy Lampert and address 120B Avondale Road ,Bromley BR1 4EY

Sincerely
Dorothy Lampert

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Wednesday, April 24, 2024 10:54 AM
To: Dorothy Lampert [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: FW: Comments for Planning Application 24/00061/

Dear Dorothy Lampert

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

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Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Dorothy Lampert [redacted]
Sent: Tuesday, March 19, 2024 6:42 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Comments for Planning Application 24/00061/

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I write to communicate profound objection to Planning Application 24/00061

A 45 storey tower would completely dominate the Grade 1 Listed synagogue skyline. Such a building would be allowed next to St Paul's Cathedral. Judaism observes lunar months: the view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. It would reduce daylight to a trickle. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The plans have been previously turned down and now based on the most cosmetic / superficial amendments being rushed through with an indecent haste. One has to ask why. With the trend to work from home there is no shortage of existing buildings in the locality being repurposed for residential needs. And straight forward applications are also being approved. There is no legal or moral justification for this abomination. It would be a stain on the landscape and also Britain's standing as a tolerant and multi faith society that respects freedom of worship and cultural diversity. It does not sell out on these values which are respected the world over for a cheap buck. Do not permit this unconscionable edifice to go ahead especially as it has been turned down on solid grounds recently.

Sincerley

Dorothy Lampert

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Website: http://www.cityoflondon.gov.uk

Begum, Shupi

From: FJK[redacted]
Sent: 26 April 2024 13:14
To: Ipaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Application24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Shupi Begum

Thank you for your email and explanation.

My address is 25A Kidderpore Avenue, London NW3 7AS.

Please let me know if you require further information.

Kind regards

Fuad Kateb

On 24/04/2024 14:46, Ipaburystreet wrote:

> Dear Fuad Kateb,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

> **From:** FJK[redacted]
> **Sent:** Sunday, March 31, 2024 6:01 PM

To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Application24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am a member of Bevis Marks Synagogue and have previously objected to 31 Bury Street application to multi story office building, and would like to register my objection to the new design which does not address the following;

1. The 45 storey tower will completely overwhelm a grade one listed building in a conservation area.
2. It would destroy the southern sky view, which is an essential part of setting part of the synagogue and interfere with the conduct of the services during certain parts of each month.
3. It would overshadow the synagogue and its courtyard. As you may well know the synagogue is dependent on day light due to its original classical design and any loss of daylight will have significant effect on its use for praying during day time.
4. The development site is within the Creechurch Conservation Area, and the proposed building will have significant effect on the character of the area.
5. I do not accept what the Developers offering of planning benefits for the area is a substitute for the damage the proposed building will do to the setting of other heritage assets in the area.

I look forward to be updated on your decision

Kind regards

Fuad Kateb

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Begum, Shupi

From: Alastair Bloom [redacted]
Sent: 25 April 2024 16:58
To: lpaburystreet
Subject: Re: Objection

THIS IS AN EXTERNAL EMAIL

My full address is :

3, Sydney Grove
Hendon
London NW4 2EJ

On Wed, Apr 24, 2024 at 10:38 AM lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Alastair Bloom,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> CITY OF LONDON
>
> Shupi Begum
>
> Planning Administrator|Development Division
> City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Alastair Bloom [redacted]
Sent: Monday, March 18, 2024 2:19 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Objection

THIS IS AN EXTERNAL EMAIL

Dear Sir/ madam,

If the synagogue affected by this hugh development was a church with a similar claim to

be the oldest in the country this application would not even be considered.

The effect on this gem of a synagogue is undeniable.

This decision to allow the building is nothing less than antisemitism.

Please reconsider

Alastair Bloom

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potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

CONSTRUCTION YOUTH TRUST

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

Thursday 28th March 2024

Dear Ms Tastsoglou,

Re: The future of education and community spaces at Holland House

I am writing to express support for the planning application for the redevelopment of Bury House, Holland House and Renown House (Planning application reference 24/00021/FULEIA), which includes the cultural strategy around supporting the local community.

We were first contacted by the Applicant about the use of the spaces within the historic Holland House on 24th January 2023. We are a registered charity offering support for young people in overcoming the barriers to employment and helping them to discover a career in construction and in the built environment.

We have now held three successful work experience sessions at Holland House on 3rd-5th May, 5th July, and 14th July 2023 (all free of charge). We have been told we can make further bookings to suit our calendar of sessions in 2024; an offer we are hugely grateful for and enthusiastic about.

It is a great benefit to CYT to be able to take the young people we are working with out of their normal school environment and give them a sense of what it's like to work in an office setting. The space at Holland House gives us plenty of scope for activities, with varying room sizes to suit our needs. Our staff found it a pleasure to have such flexibility and to work in this beautiful building that has so much character.

We therefore welcome the proposed application in principle and hope that the City of London will approve the proposals, which will allow our charity to have continued access to a fantastic venue for inspiring our young people into the world of work.

Kind Regards,

[redacted]

Tommy Farrell
Head of Development

London Scottish House, 95 Horseferry Road, London, SW1P 2DX
E hello@constructionyouth.org.uk T 0207 467 9540

CONSTRUCTIONYOUTH.ORG.UK

Patron: HRH The Duke of Gloucester KG GCVO Charity no: 1094323 Company no: 04461612

Creative Land Trust

Anna Tastoglou
City of London Corporation
Department of Planning and Transportation
PO Box 270
Guildhall
London
EC2P EJ

28 March 2024

Dear Ms Tastoglou,

1-4, 31, and 33-34 Bury Street, London EC3A 5AR – Planning application reference 24/00021/FULEIA

I am writing on behalf of the Creative Land Trust in support of the planning application being brought forward by WELPUT for the redevelopment of Bury House, Holland House and Renown House.

The Creative Land Trust was established to help secure affordable space for artists and creatives to ensure a vibrant and prosperous future for this critical industry. There is a notable lack of affordable workspaces in the City of London and for aspiring artists to show case their work. Additionally London's many studio providers are facing growing difficulty in securing even 'meanwhile' space in the City. Our vision is to address this through acquiring properties and providing long-term, secure, affordable creative workspace.

We were first contacted about the spaces in Holland House on the 8th December 2023 and we enjoyed viewing the historic building and discussing how we could best utilise the opportunity presented through the refurbishment and restoration of Holland House. We have since used the spaces within the building for a variety of events, including our 'Team Day' on the 15th November 2023.

The historic building and spaces within present a unique opportunity to serve unmet demand from local artists and makers, giving them space to collaborate, create and showcase their work, as well as acting as a potential new attraction in the City.

We therefore support the application in principle and believe it will make a positive contribution to the long term cultural success of this part of the city.

Yours sincerely,

[redacted]

Gemma Dean
Head of Development

Dairy Meadow
Primary & Nursery School

Swift Road, Southall, Middlesex UB2 4RP
Phone: 020 8571 7925
Email: office@dairy-meadow.ealing.sch.uk

Anna Tastsoglou

Principal

Planning Officer (Development Management)

Environment Department

City of London

Guildhall

EC2V 7HH

Friday 15th March 2024

Dear Ms Tastsoglou,

Re: The future of education and community spaces at Holland House.
Planning Reference: 24/00021/FULEIA.

As an experienced primary school teacher and school leader, I have seen my profession change wildly across the last two decades. We are no longer individuals who impart facts to children from the hours of 9.00am to 3.15pm hoping that something sticks, we are now architects of the future responsible for all aspects of child development. All careers of the future start with a seed or an experience that is nurtured within a school setting. Making links with future careers and giving learning a purpose is the bedrock of successful education hence why our experiences at Holland House with Dr Sharon Wright have made such a difference to our children.

Just travelling to Holland House helped build the cultural capital of our children. Coming from an incredibly deprived part of West London where most of our children are EAL (English as an additional language) and the progeny are part of an insular community that may not venture out the borough, travelling to Holland House was an eye opener. Getting on the Elizabeth Line, going up an escalator, walking through the City, gazing at the polished metal and glass, seeing workers that may look like them – this is inspirational for our children. Knowing that the financial heartbeat of the country can be reached in less than 30 minutes from Southall and becoming increasingly aware of the fact that the City of London could be a place of future employment frames the educational experience we hope to offer.

Then there's the building itself – we teach the skills of comparison all the time in the primary curriculum – nestled next to the Gherkin and dripping in history. Our children had never seen anything like it: the aquatic tiles, the maritime theme echoed throughout, sitting in a boardroom from reclaimed wood – it's the closest some of our children have been to getting on a boat! Couple this with the role of shipping in the founding of Great Britain, it ties in with our fundamental British Values as well as providing a starting point for a conversation on the role of Empire and the

Dairy Meadow
Primary & Nursery School

Swift Road, Southall, Middlesex UB2 4RP
Phone: 020 8571 7925
Email: office@dairy-meadow.ealing.sch.uk

decolonisation of the curriculum. The sheer space within Holland House lends itself beautifully to learning experiences for all ages.

These workshops are what children remember about school, the people who give up their time and energy to actually guide and inspire – Sharon is the embodiment of this. At Dairy Meadow we were fortunate enough to run three workshops together across a two term period. We brought our school council and our Pupil Premium (the most vulnerable of risk of underachievement) children to have a tour of the building and supplement their DT and Skills Builder curriculum by designing sustainable work spaces of the future. The purpose of these visits were to: gain a potted history of London's financial centre, understand the jobs that occur in the city of London and contribute to the positive sustainable changes that they would like to see.

A further workshop involved us taking all 53 Year 6 children for a 'world of work' immersion day. This involved meeting the team from Bentall Green Oak and having a series of presentations from inspiring individuals within the construction industry. All of our presenters were female which was an absolute surprise to our young ladies who are often subjected to cultural boundaries when thinking of further employment. From there we had a CV writing workshop and mock interviews! I don't know of any other primary school that has undertaken such an ambitious project, we really couldn't have completed it without the help of Holland House and Dr Sharon.

I appreciate that this is just the experience of one primary school however you can not underestimate the impact these visits had for our children. Everything in London is getting more expensive and difficult – as a result the day to day worlds our children inhabit get smaller and smaller. It's only through events like I've mentioned that we can give the children the chance to envisage a life beyond their immediate future and encourage our future workers the chance to dream big.

Happy to discuss anything that has been mentioned above, photos and pupil/staff voice available on request.

Yours,

[redacted]

Alex Feldman

Deputy Headteacher.

Please reply to
3 Lindrick Close
Daventry
NN11 4SN
07753 771140

From the Chair

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

11 April 2024

Ref. Bury Street Cultural Strategy – Planning application ref. 24/00021/FULEIA

Dear Ms Tastsoglou,

I write in my capacity as Chair, Darjeeling Children's Trust, a charity registered in England and Wales, to support the proposed redevelopment of 1-4, 31 and 33-34 Bury Street, EC3A 5AR.

To help you understand why an organisation whose work is focused on a city in West Bengal should be strongly supportive of a redevelopment plan in the City of London, let me provide a brief explanation. Darjeeling Children's Trust (DCT) is a small charity, dedicated to improving the educational opportunities, health and general wellbeing of children and young people who come from families of very limited means. As you may imagine, demand for our support greatly outstrips our capacity to supply it. Nevertheless, a small but excellent team on the ground in Darjeeling, supported by a UK-based Board of Trustees whose principal purpose is to generate funds to finance the work, manages to deliver programmes of a range and quality which belies our modest funding base. We are confident that few charities exceed DCT in terms of wringing the last penny of value from every pound raised.

With this in mind, you will appreciate that support in kind has a direct link to the provision of support to children in Darjeeling. With a month's school or college sponsorship costing in the region of £50 per child per month, facilities provided to DCT *gratis* — when other, equivalent, options were costed at between £400 and £500 — immediately releases funds equivalent to between eight and ten months' of sponsorship.

We have been privileged to use meeting facilities at Holland House for meetings of the DCT Board and we hope to be able to use them again in the future, whether for formal meetings or for events designed to explain our work to potential supporters. Even before the proposed redevelopment, these facilities are unquestionably of a quality rarely enjoyed by small charities who are usually compelled to go for the cheapest available option. If one were to multiply the benefits received by this one, small, charity by the number of charitable, educational, faith-based and other community groups who stand to gain from the proposed redevelopment of the Bury Street premises, the aggregate gain to society in general is surely significant.

It will not surprise you, therefore, when I say that Darjeeling Children's Trust strongly supports Welput in its proposals to redevelop Bury Street in the manner set out in their application.

Dr Graham Cory
Chair, Darjeeling Children's Trust

بسم الله الرحمن الرحيم

HALLS4JUMUAH

Anna Tastsoglou,
Environment Department,
City of London,
Guildhall,
London,
EC2V 7HH

18 March 2024

Dear Anna,

Re: Application Reference 24/00021/FULEIA

My name is Aslam Baccus and I am a trustee of the charity Halls4Jumuah in London. Our main purpose is to hire halls and venues across the City of London to provide muslim men and women working in the city with a place to perform their Friday prayers.

At present, we are hiring six halls within the city, including Holland House in Bury Street, London, EC3A 3BP. We have been using the hall every Friday since the beginning of January 2024 and we manage the venue with the help of our on-site volunteers. To ensure the venue as well as the attendees are safe and capacity is kept under control, we record the names and phone numbers of anyone coming in to perform their prayers. Currently, we have an average of 40 people attending Holland House each week, using a hall that has the capacity to host 150 people. The venue is in an excellent location in London and our numbers are gradually increasing as more people become aware of its whereabouts.

The owners of the building have been absolutely first class in providing our charity with their support to allow members of our community access to perform their weekly prayers, and we are always rest assured that the venue is clean, spacious and welcoming.

We have benefitted greatly from a review of the proposed development plan and we feel that the idea of turning the Lower Ground, Ground and First Floors into spaces that can accommodate small and local charities as well as community based projects truly inspiring.

We at Halls4Jumuah hope the project with be successful and full credit must go to the management of the building who are always a pleasure to work with.

Kind regards,

Aslam Baccus
Halls4Jumuah Trustee

Oxford Brookes University
FACULTY of TECHNOLOGY, DESIGN and ENVIRONMENT

Headington Campus Gipsy Lane
Oxford OX3 0BP UK

T [redacted]
e-mail [redacted]

18 March 2024

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

Ref: Holland House/ Bury Street Proposals, application reference number 24/00021/FULEIA

Dear Ms Tastsoglou,

I am writing with regards to the development proposals for Holland House, Bury Street. I regard the proposals as an exciting opportunity within the City of London. As an academic working for one of the country's top schools for the study of the Built Environment I am well versed in planning applications across the country and often use the City of London for case studies. Over the last ten years I have brought groups of students to the City of London and in the last 2 have utilised the facilities at Holland House. With the many pressures on University budgets, being able to utilise Holland House has meant that we have been able to continue to bring students to the City and see first-hand how the Eastern Cluster has been transformed and continues to evolve. This has enabled students to enrich their education that will have long lasting public benefits. The potential for further public benefits to be generated by the proposed development is significant and I relish the chance to use the new flexible learning spaces to help educate the next generations of Built Environment professionals.

Yours sincerely,

Dan Sames
Senior Lecturer in Planning
Subject Coordinator for Planning and Property Development

Norvin House
45 – 55 Commercial Street
E1 6BD

15 March 2024

Dear Anna Tastsoglou,

I am writing to express support on behalf of The Switch for the planning application for Holland House, Bury House and Renown House (application reference 24/00021/FULEIA). The experiences of our organisation, at this venue have been exceedingly positive, and I believe that the proposed enhancements will further contribute to its value as a community resource.

At The Switch we used the meeting rooms for our strategy day as we do not have the appropriate space in our own offices. The availability of additional rooms for breakout spaces allowed for productive discussions and collaborative work, creating an environment conducive to effective strategic planning. The well-equipped kitchen facilities were an added advantage, providing our team with the necessary amenities to ensure a smooth and efficient day.

Furthermore, we were able to collaborate with the Learning Crowd to facilitate a week of Work Experience activities in the construction and engineering sector for 20 Year 10 students from Mulberry Stepney Green School. This was a hugely successful event and we received positive feedback from the students. It is often very difficult to run activities for such a large amount of students but this space made it possible. Again the breakout rooms proved invaluable for group work, and the board room provided a professional setting for presentations. The location of Holland House gave students insight into working in the City of London. Students were able to experience the various buildings and organisations to expand their horizons. Many students commented they would like to work in the city in the future as a result.

The Switch supports the planning application for Holland House, Bury House and Renown House and we look forward to using the multifunctional space in the future.

Yours sincerely,

[redacted]

Nicola Chadwick

Norvin House
45 – 55 Commercial Street
E1 6BD

15 March 2024

Dear Anna Tastsoglou,

I am writing to express support on behalf of The Switch for the planning application for Holland House, Bury House and Renown House (application reference 24/00021/FULEIA). The experiences of our organisation, at this venue have been exceedingly positive, and I believe that the proposed enhancements will further contribute to its value as a community resource.

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The Switch supports the planning application for Holland House, Bury House and Renown House and we look forward to using the multifunctional space in the future.

Yours sincerely,

[redacted]

Nicola Chadwick

upReach
Transforming Social Mobility

68-80 Hanbury Street

London, E1 5JL

26th March 2024

Dear Ms Tastsoglou,

I am writing on behalf of upReach Charitable Company in order to express our support for WELPUT's planning application to redevelop Holland House, Bury House and Renown House to the City of London Corporation (Planning Reference 24/00021/FULEIA).

upReach's charitable mission is to support undergraduates from lower socio-economic backgrounds to access and sustain top graduate jobs. Working in close partnership with leading employers and universities, we deliver a programme of 1-to-1 coaching to eligible undergraduates. Our programmes currently provide personalised support to 3,000 students from across the UK, supporting them to discover different career options, and develop the vital skills, networks and experiences needed to succeed in their chosen career and beyond. WELPUT are one of our employer partners, and we are delighted to support this application.

As part of our partnership with WELPUT, we have recently used the space at Holland House on two separate occasions. The first time was on November 9th 2023, in order to provide valuable line management training for a small group (c. 15 members) of our team. The second time was on the 30th January 2024, when we bought our whole London staff team together (c.35 people) for a day of collaboration and team building. On both occasions Holland House provided the perfect venue - the staff were incredibly friendly and welcoming, and we gained huge value as a team. As a charity, there are very few available, affordable or free options in London for this kind of training, and given our responsibilities to ensure all charitable funds are spent for the good of our beneficiaries, places like Holland House make a big difference, not only for our team but for the impact we can have as a charity.

We would love to continue to use the space, and in the future would like to use it for events involving our beneficiaries in addition to our team. Particularly as we work with those who may have very little work experience or, indeed, experience visiting this part of the city and experiencing a workplace, the proposed redevelopment should have a fantastic impact on these students who would have the opportunity to develop their employability skills in such a wonderful setting and great part of the city to learn about different careers.

Please do feel free to contact me if you have further questions or would like more information, I can be reached via [redacted]

Kind regards,

[redacted]

Sara Furness
Director of People and Strategy
upReach

WONDERINGMINDS

07725 316 303
www.wonderingminds.co.uk
wondaeringmindscic@gmail.com
38 Astbury Road, Queens Road Peckham, London, SE15 2NJ

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

application reference number (24/00021/FULEIA)

To whom it may concern,

This is a letter which outlines the use of Holland House by community interest company Wondering Minds CiC for purposes looking to up lift the community.

Wondering Minds are a community interest company who are committed to finding alternative solutions to the mental health crisis through art, storytelling and nature. We engage people in meaningful creative activities while building community, creating employment and creating radical therapeutic shifts in peoples lives. So far we have used the space at Holland House for a collaborative filmmaking course which bought together people living with complex mental health to engage with filmmaking and storytelling. The space was used to train people with cameras, allow them to shoot their films and create a community filmmaking screening in July where we bought over 50 people together to watch short films and have meaningful discussions around mental health and the importance of collaboration.

Spaces like Holland House are so important to community building as there is very little space available which is free or affordable for people to come together. We have capacity to use HH permanently or on a short term let to create an office and creative hub where we can manage our community wellbeing projects, offer space to people who are in recovery. A space to come and be creative, set up an editing suite for our service users to make work, a location for filming for our participants and create drop in sessions for people struggling with mental health to engage in creative activities.

Regards,

[redacted]

Matthew Somerville
07725 316 303
Director - Wondering Minds CiC
www.wonderingminds.co.uk

YOUTH LINK NETWORKS
CHANGING LIVES

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

Dear Anna

My name is Karla Simpson, CEO of Youth Link Networks Charity no 1185081.

I write to share my delight and appreciation for the wonderful service from staff and building accommodation/facilities at Holland House.
4 times a year, the charitable trustees at Youth Link Networks convene for quarterly meetings and very timely, a dear friend and supporter of the charity recommended Holland House to us whilst we searched for an appropriate space to host our most recent in person meeting since pre Covid-19.
Our meeting at Holland House took place on Sunday 13th August 2023 and leading up to the day we had a friendly face call introduction where emergency evacuation protocols, building facilities and Q&A session was discussed and I feeling reassured that using Holland House would be the right space for us.

The boardroom was a perfect allocation. In total, 4 trustees were present for the meeting, and we had the entire space to brainstorm ideas across the table, use multiple presenting screens and host lunch whilst utilising the kitchen space and facilities.

We envisage to use the space at Holland House for more trustee meetings and possibly utilise the space for other charitable events in the near future.
Spaces like these being offered to grassroot charity of Youth Link Networks kind is crucial for our developmental growth. To know that we can come together as a team to strategize for worthy and life changing causes without the additional administrative cost pressure makes such a difference and its causes like this that we would hope to see long continue.

YLNETWORKS

Your sincerely

[redacted]

Karla Simpson CEO

Charity number: 1185081
Youth Link Networks

YLNETWORKS

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application reference: 24/00021/FULEIA.
Date:	17 April 2024 10:13:11
Attachments:	image001.png image002.png image003.png image005.png
Importance:	High

Hi all,

Please see below objection re the above application. Can this be uploaded on public access?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Raymond Silverstein [redacted]
Sent: Tuesday, April 16, 2024 4:58 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning application reference: 24/00021/FULEIA.
Importance: High

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou

I am writing in my personal capacity to object to planning application reference: 24/00021/FULEIA.

My place of work is 6 Bevis Marks, very close to Bevis Marks Synagogue.

I accordingly have practical, on the ground, knowledge of the area and interest in the Bevis Marks Synagogue, as a neighbour and also as a member of the Jewish community.

My reasons for objecting to the proposed development are:

1. It would utterly overwhelm the synagogue, a Grade 1 Listed building of major historic and cultural significance.
2. It would block the southern sky view which is important for religious ritual.
3. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations.
4. It would further reduce the already minimal daylight that enters the synagogue, making it yet more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.
5. The developers say they will provide planning benefits that outweigh the harm to the synagogue however these do not bear scrutiny. Many – for example, being car free, demonstrating holistic environmental design, having consolidated deliveries – are merely features to be expected in any modern commercial building, and do not represent a gain to the community.
6. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.

Please acknowledge receipt.

Yours sincerely,

Raymond Silverstein **(him/his)**
Partner

Browne Jacobson

m [redacted]
t
brownejacobson.com

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning Application Reference: 24/00021/FULEIA
Date:	17 April 2024 12:54:51
Attachments:	image002.png

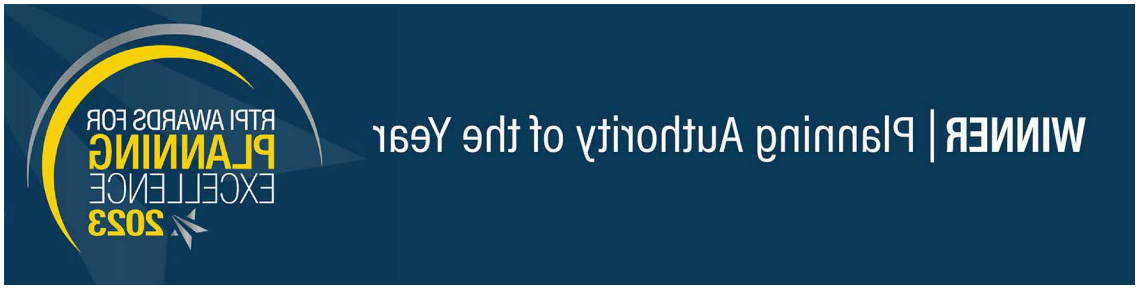
Hi all,

Please see below objection re the above application. Can this please be uploaded on the file of the application?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Janette Sassoon [redacted]
Sent: Wednesday, April 17, 2024 12:53 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning Application Reference: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish & Portuguese Jewish Community of which Bevis Marks is a part of and I'm writing to express my strong opposition to this new application (24/00021/FULEIA). and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK.

The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.

This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.

I urge you to refuse this application.

Yours sincerely,

Janette Sassoon
165 Coleridge Way
Borehamwood
Hertfordshire
WD6 2AF

Begum, Shupi

From: Yarema Ronish[redacted]
Sent: 21 April 2024 18:01
To: Ipaburystreet
Subject: Objection to Holland House applications 24/00021/FULEIA and 24/00011/LBC
Attachments: YR objection to Holland House applications.pdf

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am a resident of Algate Ward. Please find attached my detailed objection to these applications.
The online form did not give sufficient space to address all the issues. I would like it to be clear that I am making these comments as a resident. When I previously objected to a planning application for another development, the developer looked me up and contacted me directly. Please make it clear to the developer that I do not wish to be contacted.

Best regards,
Yarema Ronish
Flat 5, 4-8 Creechurch Lane
London, EC3A 5AY

Objection to Holland House applications
24/00021/FULEIA and 24/00011/LBC

My wife and I are residents of Aldgate ward as well as Freemen, and the City is our full-time home. We object to these applications on the following grounds:

HARM TO LISTED BUILDING

This proposal does harm to the curtilage and setting of Holland House and the Bevis Marks Synagogue. Holland House is internationally significant and written up in many books on modernist architecture, while the synagogue is the oldest in the UK.

HARM TO STREETSCAPE & CONSERVATION AREA

Changing the floor levels and glazing of Reknown House, and replacing the existing roof and dormer windows with modern ones adversely affects its character. See Design & Access Statement, page 6 where Reknown House looks like a hollowed-out shell. This should not be permitted within the Creechurch Conservation Area.

It is difficult to see how inward-facing retail shops can survive on a secondary street, moreover these do not contribute active frontages to Creechurch Lane.

LACK OF PUBLIC BENEFIT

The James Court pocket park proposals do not constitute a proper park, as this is located under an undercroft similar to the Cheesegrater, which is only used as a forecourt and for food trucks – no-one ever sits there. A park without sunlight is useless to the public.

Sufficient community facilities already exist in Aldgate Ward at 107 Leadenhall, where Theatre Deli (www.theatredeli.co.uk) provides two floors of low-cost rooms for dance, exercise, martial arts and acting classes, run by a social enterprise and open six days a week from 10am to 10pm. Therefore, the provision of community facilities by the developer is would not provide any additional benefit to residents and workers.

DAYLIGHTING

The Radiance Assessment missed the flats at 4-8 Creechurch Lane. The proposed tower will overshadow the north and west facing windows, and therefore the applicant is required to submit an analysis of this.

The EIA provides a daylight analysis of 4-8 Creechurch Lane, but there a fundamental error in the report. On the north-facing Window Map at page 9, Annex 6, windows W15 are in fact blocked, each bedroom has one window not two. Thus the analysis for R4 of 4-8 Creechurch Lane is wrong and should be resubmitted.

As to 18-20 Creechurch Lane, it is not acceptable to reduce the Vertical Sky Component of nine habitable rooms to under 3% (Radiance Assessment, Part 3, page 44).

As to 2, 10-16 Creechurch Lane, it is not acceptable to reduce the Vertical Sky Component of ALL the habitable rooms to 3% (Radiance Assessment, Part 4, page 63).

LACK OF PUBLIC ENGAGEMENT

The residents of the eight flats in 4-8 Creechurch Lane were not invited to the June 2023 Public Exhibition, despite what is claimed in the Design & Access Statement.

Yours sincerely,

Yarema Ronish

E.J.C. ALBUM, OBE
47 LYNDALE AVENUE, LONDON, NW2 2QB

Tel: [redacted]
Fax:
Mob:
E-mail:

21st April 2024

By e-mail to: anna.tastsoglou@cityoflondon.gov.uk
and by Royal Mail

Planning Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
For the attention of Ms. Anna Tastsoglou, Case Officer

Dear Sir,

Re: Development Alongside Bevis Marks Synagogue
Planning Application Reference 24/00021/FULEIA

I am writing with reference to the proposed development alongside the Bevis Marks Synagogue. I understand this comprises a 45 storey building to the south of the Synagogue. We very much hope that this will not be allowed to proceed as we are clear that it will severely limit or indeed eliminate natural light for the Synagogue.

I am a long-standing member of the Spanish & Portuguese Congregation and of the Synagogue concerned, which I attend regularly. I have, in the past been a member of the governing body of the organisation.

We are aware of the initial view that the development would be undesirable but we understand that it is currently being seriously considered. We are informed that it is a speculative development without a commitment from a potential occupant.

We appreciate that you have to consider the matter in relation to planning policy but we do hope and strongly suggest that this should include the preservation of a long established building (dating from 1701) and also a long-standing heritage site which is of benefit to the City of London as a whole.

We ask you to consider the matter in broad terms as in appropriate in heritage terms and to bear in mind the interests of the Congregation and Community, the Synagogue having been in continuous use since 1701. May I also include a reference to the external Memorial Plaque showing the substantial contribution of the Community to Britain in the World Wars, including a VC awarded in the First World War.

I should appreciate your acknowledgment to this letter and your helpful consideration of this matter.

Yours faithfully,

Edward Album

cc: Rabbi Shalom Morris

Begum, Shupi

From: Jonathan Ben Garcia [redacted]
Sent: 22 April 2024 17:01
To: PLN - Comments
Subject: Re: Objection to Planning Application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am writing to object to the new planning application 24/00021/FULEIA for the proposed tower block at 31 Bury Street. Several of these points are the same as previous applications 20/00848/FULEIA for the proposed tower block at 31 Bury Street and 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane (see emails below from November and December 2020).

To supplement my previous objection, I have the following additional comments:

- Last year the Creechurch Conservation Area (CCA) was implemented. In the consultation prior to the CCA, there were several different options. One excluded 31 Bury Street from the CCA, another included 31 Bury Street in the CCA. The City agreed to the inclusion of 31 Bury Street in the CCA. Given that the options were clearly presented and a firm decision was reached, **this application should have been rejected before it even arrived at the consultation stage**.

Best regards
Jonathan

Jonathan Ben Garcia
11 Templars Ave, London NW11 0PB

On Thu, 24 Dec 2020 at 16:24, Jonathan Ben Garcia [redacted] wrote:

> Dear Mr Richards
>
> I am writing to object to the new planning application 20/00848/FULEIA for the proposed tower block at 31 Bury Street. Several of these points are the same as the planning application 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane (see email below from 21 Nov).
>
> To supplement my previous objection, I have the following additional comments:
>
> - As well as it being forbidden to use a microphone, there are also several sections of the service that involve silent meditation. Increased noise from pedestrian traffic and cyclists would interrupt these moments of silent meditation.
> - Rabbi Morris has also released a new video regarding the impact of the proposed tower block on the Synagogue's lighting: https://youtu.be/196tIlzTb2w. As Bevis Marks Synagogue is Grade 1 listed, it's environment should be preserved including the natural light on the eastern side and to it's courtyard.
> - As well as being used for religious worship, "civil services have been held at Bevis Marks for many occasionsincluding the 50th anniversary of the Council of Christians and Jews, the 50th Anniversary of VE Day and the first visit to Britain of a president of Israel ... (in 1984 for the bicentenary of the birth of Sir Moses Montefiore and in 1965 for the death of Sir Winston Churchill." see https://www.sephardi.org.uk/bevis-marks/history-design/ . The building works and subsequent tower blocks will impact on such future events.
>
> Best regards

Jonathan Ben Garcia

Flat 6, Heathway Court
Finchley Road
LONDON NW3 7TS

On Sat, 21 Nov 2020 at 21:52, Jonathan Ben Garcia [redacted] wrote:

Dear Mr Richards

I am writing to object to planning application 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane for the following reasons:

- Building works for the proposed tower block would impact on the ability of the community of Bevis Marks Synagogue to hold regular services and host weddings. On the Jewish Sabbath and Holy Days, it is forbidden to use a microphone, so it would be impossible to compete with the noise from the building site. It is also important that the synagogue be able to retain its step-free access from the entrance on Heneage Lane.
- The proposed tower block would significantly reduce the synagogue's lighting, by blocking natural light on the eastern side. Rabbi Morris has several videos dedicated to Bevis Marks' architecture (www.youtube.com/channel/UCXBehglz-MVe4TpLDGCNcbg) and how these could be impacted by the proposed tower block. I would commend these to the planning committee when they come to their decision.
- Bevis Marks Synagogue is one of three Grade 1 listed Synagogues in the UK. It has been open for worship every year since 1701. For the Jews of the Spanish and Portuguese Congregation, the Synagogue surviving the Blitz is as much of a miracle as its Christian fellow, St Pauls, which was constructed at the same time.
- On a personal note, Bevis Marks Synagogue is very close to my heart. As a child, we would regularly attend the Synagogue on Sundays for its daily morning service. As a treble chorister, I was invited to sing in the 300th anniversary of the Synagogue. I wrote a project about the Synagogue of the Square Mile when I was eight, which I presented to my class at school (I have attached a copy). More recently, my wife and I were married in the Synagogue.

Best regards

Jonathan Ben Garcia

Flat 6, Heathway Court
Finchley Road
LONDON NW3 7TS

12/125 Hornsey Lane, London N6 5NH

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

21 April 2024

Dear Ms Tastsoglou

Reference 24/00021/FULEIA

I wish to **OBJECT** to the above planning application, for which I understand you are the case officer.

While the proposed building may be well designed and environmentally sustainable, that is no more than one would expect from any modern building. However, it is in a completely inappropriate position.

The Bevis Marks Synagogue is of huge religious, cultural and historical importance, in the City, across wider London, the UK and beyond. Its setting and operation would be significantly harmed if such a building was allowed to proceed.

The proposed building would bring no significant benefits, but rather cause immense detrimental impact to the Synagogue, as it would overshadow it literally, figuratively and architecturally. It would reduce the already low level of daylight in the Synagogue, making it harder to use for worship. (Of course, due to the historic nature of Bevis Marks electric lighting has to be limited.) It would also reduce the use of the courtyard for a variety of activities.

This is within a conservation area and I understand that current planning policy is not to allow tall buildings in conservation areas, so there is a conflict of interest with the statutory development plan. The existing building at 31 Bury Street is relatively recent and could be refurbished.

As well as supporting development, the City has a duty to protect its distinguished assets, of which Bevis Marks is surely one, so I urge it to reject this absurd proposal.

Please note - I wish my name and address to be withheld, therefore I understand that my comment will be anonymous. Thank you.

Yours sincerely,

[redacted]

Jodi Myers

Begum, Shupi

From: Everett Jacob [redacted]
Sent: 30 April 2024 15:11
To: lpaburystreet
Subject: RE: 24/00021/FULEIA and 24/00011/LBC Return address

THIS IS AN EXTERNAL EMAIL

Dr Everett M Jacobs
Apt 29 Braemore
268 Ecclesall Road South
Sheffield S11 9NU

> On 29/04/2024 13:33 BST lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Dr. Everett M. Jacobs,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: everett.jacobs10[redacted]
Sent: Saturday, April 13, 2024 1:46 AM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

Yet another proposal to destroy a bit of historic London in the name of 'progress' (but more rightly called greed). My interest in this is my membership of the Bevis Marks Synagogue, so close to the area under consideration.

What is the point of designating Conservation Areas if you do not preserve their character and appearance? The same consideration goes for designating buildings of Special Architectural or Historic interest, whose environs must not be spoiled..

This monstrous project, with a 43 story tombstone looming over a conservation area is completely wrong-headed, and must be resolutely opposed.

Thank you for your attention.

Yours faithfully,

Dr. Everett M. Jacobs

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Begum, Shupi

From: Andy Coghill [redacted]
Sent: 04 April 2024 17:22
To: lpaburystreet
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Hello,
Thank you for your reply. Could you let me know specifically which development this was, and when I previously made representations? I don't recall doing this, though of course I could be mistaken, so if you could provide any emails I have previously sent pertaining to this that would be most appreciated.

Many thanks,
Andrew Coghill

On Thu, 4 Apr 2024, 15:40 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> *Dear contributor,*
>
> *Thank you for your email.*
>
> *Please note that you have been notified on this application due to the submission of a representation for a development previously proposed at the same site; namely Bury House, 31 Bury Street, London, EC3A 5AR (application reference: 20/00848/FULEIA).*
>
> *You are not required to make a representation in relation to the currently proposed development, albeit you have been provided the opportunity to do so, given your previous interest to the proposed development 31 Bury Street.*
>
> *If you wish for your details to be removed from our list of contributors, please let us know and the planning authority will not notify you again for any development at this site.*
>
> *Kind regards,*
>
> *On behalf of*
>
> *Anna Tastsoglou*
>
> *Environment Department*

From: Andy Coghill [redacted]
Sent: Thursday, March 14, 2024 3:11 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Please could you advise as to why I have received this email? I don't live anywhere near this address and have never previously made any representations pertaining to this or any other City of London planning application.

Many thanks,

Andrew

On Thu, 14 Mar 2024, 14:48 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Consultee/Contributor,
>
> Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)
>
> Reply with your comments to lpaburystreet@cityoflondon.gov.uk
>
> Kind Regards,
>
> Planning Administration
>
> On behalf of
>
> Anna Tastsoglou
>
> Environment Department
>
> City of London
>
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's

gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application reference: 24/00021/FULEIA.
Date:	01 May 2024 12:35:15
Attachments:	image002.png

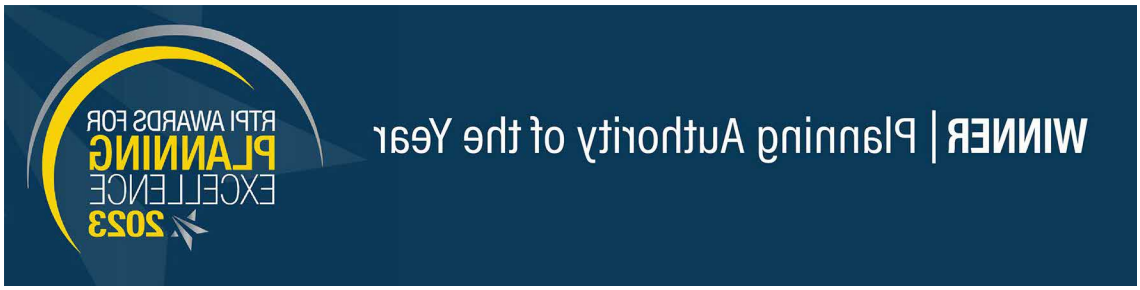
Hi all,

Another objection that needs to go on the file.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: A.E. Azagury [redacted]
Sent: Monday, April 29, 2024 1:15 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

It is with great sadness that I find it necessary after such a short time to again need to try and convince the leaders of our beloved London of the importance of preserving such an important heritage as the Bevis Marks Synagogue of 1701.

We hear our leaders proclaim the significance of the Jewish community in the development of our wonderful city over the centuries. But now you propose to reconsider a project that will completely overshadow this beautiful historical

location of worship. Try and image the reaction if a similar plan was considered to overshadow St Paul's Cathedral!!

Not so long ago this project was rejected; should we be spending our scare finances and valuable human resources to reconsider the project following what are in summary very minor changes?

To save you as much time as possible let me briefly enumerate my objections to this project:

1) the courtyard will get no light and be of little use.
2) the monthly prayers for the new moon every month will be compromised.
3) no natural light to this magnificent building
4) direct conflict with current Cree church conservation area
5) the alleged benefit by the developer are misleading and cannot stand up to serious scrutiny.

Please consider the historical importance of the heritage of our city. I realise the difficult task of balancing choices when planning for growth; but please don't be swayed by medium term financial incentives that obliterate historical values of this magnificent City.

Yours sincerely.

A E Azagury
59 Meadowbank
London NW3 3AY

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks
Date:	01 May 2024 12:37:10

Hi all,

Another objection for 24/00021/FULEIA. Can it please be uploaded on the file?

Thanks,

Anna

-----Original Message-----
From: Adrian Sayliss [redacted]
Sent: Saturday, April 27, 2024 6:04 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Bevis Marks

THIS IS AN EXTERNAL EMAIL

31 BURY STREET
I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

Yours faithfully

Adrian C Sayliss
Apt 314
3 Television Centre
101 Wood Lane
London
W12 7FS
[redacted]

From: Tastsoglou, Anna
To: [redacted]
Subject: FW: Bevis Marks Synagogue
Date: 01 May 2024 12:51:00

Hi all,

Another objection for 24/00021/FULEIA. Can it please be uploaded on the file?

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fdata 05%7C02%7Cpaburystreet%40cityoflondon.gov.uk%7C1e48f33bc1c24876ec8308dc69d47955%7C5fe65fcdb3cd40568519322 2fb98be8%7C0%7C0%7C638501610602260337%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata GqIoOIb53vu8FHDxRIvpAER5GUiEHYomyUFV4%3D&reserved 0

-----Original Message-----
From: Stuart Gibbons [redacted]
Sent: Friday, April 26, 2024 4:48 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Re: 24/200021/FULEIA

I refer to the above planning application and the serious issue of "light" for such an old and historic building.

It surely must be the responsibility of the planning office to protect the integrity of such an old building.
And my understanding is that the community should be a priority based on its long lineage.

One wanders if this was a Mosque what parades and disruption the city of London would see?

Thank you.

Kind regards,

Stuart Gibbons
Managing Director
Cirrus Capital
Thanet House
London WC2R 1DA
M [redacted]
O [redacted]
https://gbr01.safelinks.protection.outlook.com/?
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Begum, Shupi

From: Steve [redacted]
Sent: 01 May 2024 12:57
To: PLN - Comments
Subject: RE: Comments for Planning Application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

This is disregarding a preservation order for Bevis Marks.
Regards
J.S.Dreyfuss

Sent from Mail for Windows

From: PlnComments@cityoflondon.gov.uk
Sent: 29 April 2024 12:22
To: [redacted]
Subject: Comments for Planning Application 24/00021/FULEIA

Comments for Planning Application 24/00021/FULEIA

Dear Sir/Madam,

Mr John Dreyfuss,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 29/04/2024 12:22 PM from Mr John Dreyfuss.

Application Summary

Address:	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal:	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Case Officer:	Anna Tastsoglou

Click for further information

Customer Details

Name:	Mr John Dreyfuss

Email:	[redacted]
Address:	23 rotheo Gardens London NW4 3SJ

Comments Details

Commenter Type:	Other
Stance:	Customer objects to the Planning Application
Reasons for comment:	

Comments:	The development will distroy a view of a listed building and also overwhelm the synaguogue.

Kind regards

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue - Planning Application Ref:- 24/00021/FULEIA
Date:	01 May 2024 14:30:40
Attachments:	image002.png

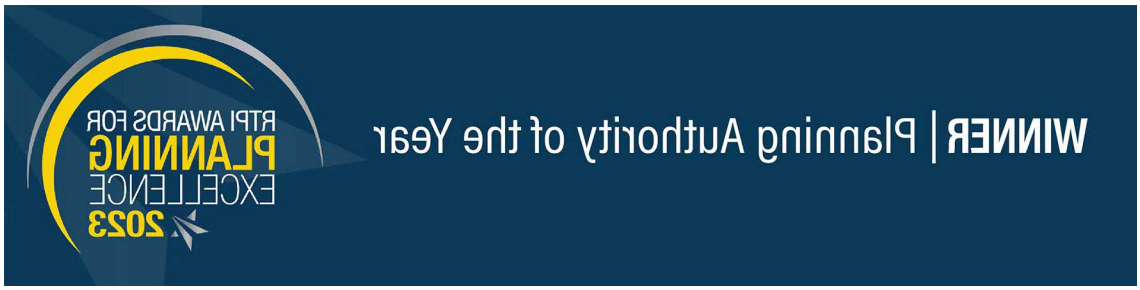
Hi all,

Another objection to be uploaded on the file of the application.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Eileen Eskenzi [redacted]
Sent: Thursday, April 25, 2024 9:44 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue - Planning Application Ref:- 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

FOR THE ATTENTION OF THE CITY CORPORATION PLANNING COMMITTEE

Subject: Bevis Marks Synagogue - Planning Application Ref:- 24/00021/FULEIA

As someone who has frequented the Bevis Marks Synagogue for prayer, attended and helped to organise some ceremonial affairs, I am mortified that the City Corporation - known for its environmental sensitivity - could be minded to pass this:-
Proposed planning application Ref:- 24/00021/FULEIA to erect a 43 storey tower block

in Bury Street. IT SHOULD BE REFUSED:-

REASONS FOR REFUSAL:-
A). If this 43 storey tower block is approved it will make a mockery of the City Corporation's very recent listing in 2023 - THE CREECHURCH CONSERVATION AREA - SPECIFICALLY IN ORDER TO PROTECT THIS AREA FROM INAPPROPRIATE DEVELOPMENT CONTAINING:-
Bevis Marks Synagogue - (Grade 1) AND
St. Botolp-without-Aldgate (Grade 11)
It will be contrary to the City Corporation's own planning statutory development plan.

B). The height and bulk of this 43 storey tower block will dwarf, over-shadow and seriously impair forevermore the present narrow sphere of natural sky entering the courtyard of Bevis Marks synagogue.
Lighting is conducive and central to those wishing to pray in a house of worship.
In the case of Bevis Marks Synagogue - it basically relies on that existing shadow of daylight and candle light within this house of prayer.
C). In view of its Grade 1 listing, Bevis Marks Synagogue deserves planning respect and sensitivity to ensure that inappropriate development is not approved.
D). Approval of this planning application will be an architectural and historical travesty!
NB:-
Abigail Green, Professor of Modern European History at Brasenose University, Oxford, is quoted to have said:-
"The heritage value of Bevis Marks Synagogue is not purely architectural. There is a difference between a place of worship of historic beauty being conserved in use, and one
kept open only as a museum.
Bevis Marks is a living community not a museum."

HISTORY
Bevis Marks Synagogue, now a Grade 1 listed building, dates back to 1701 being the
first purpose built synagogue erected in England after the readmission of Jews by
Oliver Cromwell in 1656.
It is the only synagogue building in Europe that has continuously held regular services for more than 320 years.
The architect was a Master Builder called Joseph Avis, a Quaker, who had worked for Sir Christopher Wren, as had his craftsmen.
The architectural significance of Bevis Marks Synagogue is therefore as important as its religious significance.

The developers claim:-
".....to provide substantial planning benefits which will outweigh any harm sustained by the synagogue.'
How many developers make such claims which regrettably become unviable once construction proceeds? It is a known fact that claims made by developer's cannot be guaranteed, therefore in this case, once erected this tower block will damage irrevocably the Synagogue's loss of amenity and purpose.
Bevis Marks could therefore face a closure threat!
NB.
William Whyte, Professor of Social and Architectural History at St. John's University, Oxford is

quoted to have said
”It would be a tragedy for our generation to be the ones who disregarded its significance as both an architectural gem and a precious piece of religious heritage.
Yours sincerely
Eileen Eskenzi. MBE. JP
Woodcroft
Totteridge Green
London, N20 8PE

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: BEVIS MARKS SYNAGOGUE - 24/00021/FULEIA
Date:	01 May 2024 15:04:34
Attachments:	image002.png

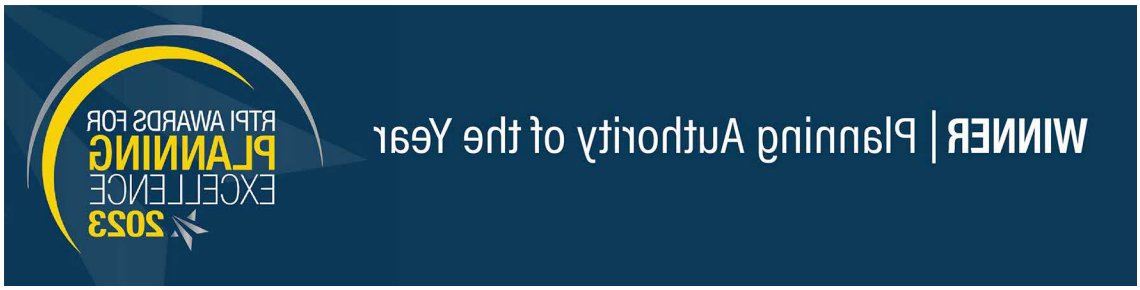
Hi all,

Another objection that needs to be uploaded on the file please.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: 802newma[redacted]
Sent: Thursday, April 25, 2024 11:18 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: BEVIS MARKS SYNAGOGUE

THIS IS AN EXTERNAL EMAIL

Please do not allow the atrocious building to obliterate the historic Bevis Marks Synagogue. You would not allow it next to Westminster Abbey, St Paul's and I doubt event next to a mosque.

If this goes ahead the cathedral Synagogue of British Jews, which is dependent on natural light would be overwhelmed and made redundant as a place of worship.

Please do not let it happen.

Martin Newman MBE DL

Colonel Martin Newman MBE DL

12 Conisborough Place
Manchester M45 6EJ
[redacted]

THE OFFICE OF HM GOVERNMENT'S
INDEPENDENT ADVISER
ON ANTISEMITISM

Anna Tastsoglou
City of London Corporation
P.O. Box 270
Guildhall, London
EC2P 2EJ

Dear Anna,

I write to express my grave concern over plans to build a forty-five-story tower block next door to Bevis Marks synagogue (planning application reference: 24/00021/FULEIA).

Bevis Marks, a Grade One listed building, is often heralded by the local community and beyond as Britian's 'Jewish Cathedral'. A building that has thrived for over three hundred years, it is a space of enormous historical and cultural significance. The fact that such a vital community hub is under threat by this development is deeply alarming.

The plans have significant implications for the usability of the synagogue, as the building of a tower block along the southern side would totally destroy the setting. Not only would important elements of religious ritual (the view of the moon's passage and many of the celestial bodies) be blocked, the synagogue's natural light levels would be so obscured that the space would be rendered unfit for conducting worship. The historic nature of the synagogue prevents the installation of additional electric lighting as a feasible alternative, leaving no choice but to consider the space unusable.

The City of London Corporation, as the municipal governing body of the City of London, has a duty to safeguard the right of the Jewish community to freely gather for worship without obstruction or difficulty. Facilitating the approval of such a development, threatening the vitality of such an essential community space, would fall short of recognising the importance of the synagogue, and in turn supporting London's Jewish community. The idea of building something similar next to St Paul's Cathedral would be inconceivable and inappropriate. The same levels of protection and preservation should be attributed to Jewish community spaces like Bevis Marks.

At a time of rising levels of antisemitism, and increased fear and uncertainty amongst the Jewish community, the protection of their places of worship and community could not be more urgent.

I hope you will take these concerns into account and reconsider the plans for this development, to ensure the life and legacy of Bevis Marks synagogue is protected.

Yours sincerely,

[redacted]

Lord Mann of Holbeck Moor
HM Government's Independent Adviser on Antisemitism

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning and development. Application ref 24/00021/FULEIA. and Listed Building consent application for Holland House
Date:	02 May 2024 06:55:30
Attachments:	image002.png

Hi all,

Please see another objection re the above application, that needs to be uploaded on the file.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Edward Teeger [redacted]
Sent: Thursday, May 2, 2024 12:54 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Planning and development. Application ref 24/00021/FULEIA. and Listed Building consent application for Holland House

THIS IS AN EXTERNAL EMAIL

Dear Anna,
As a community member and user/ participant of Bevis Marks Synagogue and citizen of London, and the UK, I call upon you to respect the Jewish community that is currently at risk on all continents and that fears for its future, to show leadership and respect for this people by refusing the application for disproportionate the tower proposed adjacent to Bevis Marks Synagogue.

It may seem to you, far from the global crisis of global Anti Semitic outpouring that has struck since 7th October 2023, (which pretends to blame every Jewish person and institution for the conflict generated by politicians ON BOTH SIDES in the Middle East, who have misused power and negated their sacred duty to protect and support their people). The relationship of a place of worship to its environment, to earth and to the heavens above, is an important and sacred factor, and the proposed building will interfere with this bond in a disrespectful manner, and indicate the triumph of financial gain over the respect for spiritual values.

This is perhaps a small item in comparison to the Town Planning rulings that limit construction from affecting the prominence of the dome of St Paul's. The iconic photograph of that dome standing alone after bombing raids on the city of London, during and after World War II, is an important symbol and reminder of the spiritual against the idols of racism and cruel domination, of human values against those of the material which lend prestige and value to our great city London.

In a perhaps a less obvious but, even so, important manner, the decision of the elected representatives of The City of London to refuse this application and others like it, will show the world, in these troubling times, respect for the inhabitants of our global city, and uphold its reputation for a unique blend of culture, values and leadership, that face an uncertain future today.

The Town Planning aspects against this application have been recorded in correspondence by others, and I concur with their views and arguments.

Yours sincerely,
Edward Teeger.

24 Parkside
London NW2 6RH.
Retired Architect and Citizen of London.

mobile number[redacted]

Begum, Shupi

From: John Lazarus[redacted]
Sent: 02 May 2024 09:14
To: lpaburystreet
Subject: Re: Planning Application ref 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Begum, thank you for your reply.

My address is
29 Staverton Rd,
London NW2 5EY

Please put my leΣer to go forward to the appropriate authoriΘes.

If you require my telephone number, let me know and I will add it.

Thank you for your cooperaΘon.

(Dr) John Lazarus

Sent from my iPhone

> On 29 Apr 2024, at 13:35, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Dr John Lazarus,
>
> Thank you for your email. I can confirm receipt of your objecΘon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecΘon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaΘon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
>
> Kind Regards
> Shupi Begum
>
>
>
>
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaΘon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hΣps://gbr01.safelinks.protecΘon.outlook.com/?url=hΣp%3A%2F%2Fwww.c

> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Ca0fed791680c4802ade308dc6a7fe9b6%7C9fe658cdb3cd405685193222ffa96b
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> Juliemma McLoughlin
> Executive Director Environment
>
>
> -----Original Message-----
> From: John Lazarus [redacted]
> Sent: Saturday, April 13, 2024 12:32 AM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: Planning Application ref 24/00021/FULEIA
>
> THIS IS AN EXTERNAL EMAIL
>
>
> Dear Ms Tastsoglou
>
> I write in frustration and despair yet again - to attempt to persuade the Philistines of the City Corporation against destroying the outlook from Bevis Marks Synagogue, a gem of a building and a precious piece of London's history from 1701, as well as one central to the Jewish population of London since that time and earlier.
>
> You will be aware of the history: in the Middle Ages, Jews were
> subjected to ever more cruel treatment and eventually expelled from
> this country in 1290. In 1656 Oliver Cromwell welcomed the Sephardi
> Jews from The Netherlands back to England, and by 1701 they had built
> their synagogue in in Bevis Marks. It is the oldest continuously used
> synagogue in not only in Britain but in the whole of Europe, and also
> has enormous cultural significance, being in effect the 'cathedral
> church' of Judaism in this city. It is frequently visited by tourists
> and is a community hub. (You might find the Wikipedia entry on Bevis
> Marks interesting.)
>
> The synagogue has been under threat from then City Corporation over several years. There are always speculators and property developers who cast a greedy eye on the area around Bevis Marks, and propose to build a tower block there. As a Grade 1 listed building it is considered 'of exceptional interest'. Not only the building itself but the courtyard is of importance to the proceedings of the synagogue services and the activities of the community.
>
> From the courtyard of Bevis Marks, it is possible on a clear night to see the moon and the stars, which is of importance to the traditions of Judaism. Because the synagogue is surrounded by larger buildings, the levels of light make a significant difference to the practicability of its use; what is more, the current proposal of a tower block will destroy both the light needed, and block the outlook towards the sky.
>
> I implore you and your team to make it easier for Bevis Marks to be protected from new buildings. The disregard for the needs of the synagogue are an insult to the people who worship there and who have previously managed to protect the synagogue from further greedy speculators. There are some things more important than money. Can not this great building be protected from further assailments?
>
> Yours sincerely
>
> Dr John Lazarus
>
> ``````````
>

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> Website:
> h-ps://gbr01.safelinks.protec-on.outlook.com/?url=h-p%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
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Rabbi Dr Michael Hilton
25 Langley Park
Mill Hill
London UK
NW7 2AA

[redacted]

Anna Tastsoglou, Case Officer
Development Division
Environment Department
City of London

6th May 2024

Sent by email to lpaburystreet@cityoflondon.gov.uk

Your ref: 24/00021/FULEIA

Location: 1-4, 31-34 Bury Street, London, EC3A 5AR

Dear Anna Tastsoglou, Case Officer,

Thank you for writing to me to seek my views on the above planning application.

Reason for writing: the proposed building of 43 above ground storeys will overwhelm the nearby Bevis Marks Synagogue which is the oldest synagogue in Europe in continuous use. I have attended for worship on an occasional basis for the past forty years. The synagogue received a grant of nearly £2.8 million from the National Heritage Lottery Fund for restoration work and the conservation of collections. Work is now almost complete, and will include a museum and heritage exhibition, whilst the synagogue will continue to serve the community through prayer services. Astonishingly, daily worship by the Minister (on his own) was able to continue right through the Covid lockdowns, and the synagogue has remained open during the subsequent building works there. It seems perverse, to say the least, to spend public money on conserving the synagogue and at the same time to destroy its wider setting with a tower block directly to the south 43 storeys high. Reductions in light, described by the developers as 'negligible', will none the less impact the reading capacity of older users of the synagogue with poor eyesight, of whom there are many. In addition, construction of the four basement levels threaten the stability of the synagogue building, since it is 323 years old and like all buildings from that period, has shallow foundations.

Heritage Policies

The published heritage plans for the City state that the surroundings of Bevis Marks Synagogue should not just be preserved, but enhanced. In contrast to this, the enhancements and green features described by the developer will have no impact on the Synagogue at all.

The envisaged City Plan 2040 has a whole section (S11) on 'Heritage and Tall Buildings'. It begins with the words:

1.Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets;
2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness

Please note also the following four specific references to the synagogue:

11.1.1 There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17th century home on Cloth Fair, the unique early 18th century Bevis Marks Synagogue, and Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects .

On tall buildings:

11.1.7 Applicants will be required to undertake a comprehensive heritage assessment proportionate to the scale of their site and heritage asset to understand ways in which their proposal could contribute towards the enhancement and enjoyment of the historic environment.

11.2.1 The City Corporation has identified 'immediate setting' areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance.

Policy HE1 6 Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered.

Policy HE1 8 Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should preserve, and where possible,

enhance the elements of setting that contribute to the significance of these heritage assets.

14 The Temple, the Thames Policy Area & the Key Areas of Change

14.6 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.

Three of the paragraphs quoted above mention the 'immediate setting' of the Synagogue. A Policy Paper (Policy Paper: Bevis Marks Synagogue – Immediate Setting January 2024 (https://www.cityoflondon.gov.uk/assets/Services-Environment/Bevis-Marks-synagogue-immediate-setting-paper.pdf) explains that the 'immediate setting' means only the buildings adjacent to the synagogue, not those in the wider area, however close by they may be. The paper contains valuable information on the architectural history and significance of the synagogue, which should be drawn to the attention of the Planning Committee.

However, the Policy Paper does also comment on the Synagogue's wider setting and argues that this too must be carefully managed:

the introduction of tall buildings, which is a relatively recent development in the context of the history of the building, has changed the character of the setting above the courtyard by introducing built form and activity into an area that was previously sky space. This has altered the sense of seclusion that is an important element of the significance of the synagogue, both functionally and symbolically.. Additionally, there are recently consented schemes for other tall buildings, some of which are currently being implemented.. further development that has the potential to reduce the sense of seclusion offered by the Immediate Setting of the courtyard framing the Synagogue has to be carefully managed.

Although not technically part of the 'immediate setting' of the synagogue, the Proposed Development is so overwhelmingly tall and close to the Synagogue that in reality it will affect the immediate setting far more than the existing tall buildings visible from the courtyard. The heritage implications are profound. Please see below for my remarks on the importance of daylight and a view of the sky for traditional Jewish worship.

The synagogue was designed by a pupil of Sir Christopher Wren and deserves as much environmental protection as the City's Wren Churches, to which it is comparable in scale and standard. In my travels round Europe I have visited many historic synagogues and seen none hemmed in and overshadowed by such a close and tall building as is here proposed. If they accept this proposal, the planning committee would be ignoring the City's

stated objective and current and past practice of seeking to preserve and to enhance the setting of heritage assets. Aldgate Square, a few metres away, enhances the setting of St Botolph's Aldgate and by providing leisure space, ensures that people stop to admire the Church. On the other side of the synagogue, the setting of St Helen's Bishopsgate has also been enhanced by new open space at the Gherkin Plaza. Contrast the synagogue, which will be hemmed in as if the City were ashamed of it.

I invite members of the Planning Committee to consider how the development will enhance the setting of the synagogue as their policies require. In view of the importance of heritage in the centre of one of the world's oldest cities, and the huge importance of tourism to the city, questions need to be asked about how these considerations are considered by the Planning Committee and in particular whether there is specific heritage representation on or to the group.

Environmental Impact References below are to paragraph numbers in the 'Environmental Statement' by Trium.

The new documents submitted on behalf of the developers repeat the erroneous argument previously used that because the setting and the light levels in and around the synagogue have been compromised in the past, it is somehow acceptable to compromise them still further.

None of the documents submitted discuss the right of the congregation to enjoy freedom of worship in the way they and their predecessors have done at the synagogue for the past 320 years.

Of the three daily Jewish prayer services, two of them, the morning and afternoon prayers, have to take place during daylight. This does not simply mean during daylight hours but in a setting which has natural light. This idea goes back to the Bible, where it is written (Daniel 6:10) **"**Daniel went into his house with the windows open in the upper chamber facing Jerusalem, and three times a day he kneeled upon his knees and prayed and gave thanks before his God.**"** The medieval commentator Rashi explains that through windows we can see the sky, and remind ourselves of our submission to heaven (comment on the Babylonian Talmud Berakhot 34b). From this you can see the importance of not shutting out or inhibiting the view of the sky from a synagogue. It also explains why the architect of Bevis Marks synagogue placed the windows high up, so that eyes could be raised heavenward during prayer. The beauty and purpose of this design will be frustrated and damaged by a view up towards new tall buildings. You cannot measure the value of the setting of a heritage asset with a light meter. None of the statements on behalf of the developers address this point.

The Environmental Impact Statement submitted by the developers has 251 pages and contains over a hundred references to Bevis Marks Synagogue. In spite of the length of the report, there is no mention at all of the view of the new building from the synagogue courtyard. This is a serious omission.

Furthermore, the Environmental Impact Statement was submitted before the Creechurch Conservation Area was established and therefore does not include any reference to the additional protection which one might expect this to provide to Bevis Marks Synagogue, to Holland House, and to the many other listed buildings nearby. The Statement notes that a previous and very similar application was refused in 2020 and details various meetings and proposals which have taken place to ensure that the new application does not carry as much environmental impact. Unfortunately, the slight reduction in height and the slimmer top of the building will make little difference to Bevis Marks Synagogue.

The report notes (9:100) that there will be a vibration impact on the synagogue during construction from pile driving, and that this will be increased when the auger hits the base of the hole However, there appears to be nothing that describes the additional affect that vibrations will have on a building more than 300 years old. This is a serious omission from the assessment, especially considering the depth of the four basement levels. Vibrations spread and so the effect of pile driving at a greater depth can be felt further away. A well written report should give examples of vibrations from different low levels, so that calculations can be made as to how many basement levels, if any, should be permitted in order to ensure that the synagogue's foundations are not damaged.

On the question of sunlight, the report claims that the Synagogue courtyard currently receives less than 2 hours of direct sunlight on March 21st and September 21st each year. However, there appears to be no mention of indirect sunlight reflected from neighbouring buildings. I have noticed myself how much the light level in the synagogue changes suddenly and markedly on a day when there are many clouds coming across the sun, as the light is reflected off the building across the courtyard into the large upper windows at the west end of the synagogue. Indeed, this dappled sunlight, coming and going through the windows and illuminating the dark wood throughout the synagogue creates a very beautiful effect. It is therefore alarming to read an impact assessment which does not even consider this.

On the question of daylight, the report makes the same error as the 2020 report, arguing that because the amount of daylight is already very low, the effect of reducing it further will be high in percentage terms, but negligible in real terms. This is tantamount to saying that because the synagogue is already too dark, it is acceptable to deprive it of even more light. The argument places the legal technicalities above what happens in real life. If I am struggling to read my prayer book on a dark day in the synagogue, even the tiniest further reduction is going to affect my reading adversely. When the light is already below par, there is no such thing as a negligible further reduction. The whole argument is a false one. The fact that the report repeats this same argument many times does nothing to enhance its case. Furthermore, it is a known fact that eye problems increase, and eyesight diminishes, with age. The reduction in daylight woefully described as 'negligible' will therefore have a disproportionate impact on older members

of the congregation, of whom there are many. This constitutes discrimination on the basis of age, which is illegal under the terms of the Equality Act 2010. **It is not sufficient for the developers merely to consider an 'average person' when assessing the light impact on a building with a high proportion of older users.** Furthermore, the higher reduction in light at upper levels is discriminatory against women users of the synagogue; the effect on those with reduced eyesight is discriminatory against less able users; and the whole project disadvantages the Jewish community which has no other Synagogue within the City of London.

Similarly, the question of overshadowing is dismissed on the grounds that the Synagogue courtyard is already in **shadow**, and therefore only a very minimal portion of the Proposed Development shadow hits the ground (10:174) at any time of the year. This ignores the fact that shadows make a difference above ground level as well, and will reduce the amount of light coming through the upper windows, especially those at the western end and the south west corner which currently provide a considerable proportion of the Synagogue's light.

Paragraph 15:9 of the report states that during demolition and construction, the Proposed Development will have significant adverse effects on the Synagogue as a result of the use of heavy machinery and tall cranes and the erection of other infrastructure needed for construction, such as scaffolding, hoarding, mobile cranes, site lighting, temporary site offices and facilities. The section of the report on mitigation does not mention the Synagogue, and there is no assessment at all of whether or not this could cause irreparable damage to such an old and fragile building.

Summary

The Proposed Development application does not take sufficient account of the City's existing and anticipated heritage policies, nor does it take account of Conservation Area policies which require any new development to enhance the setting of the synagogue.

The Proposed Development discriminates against older people and other protected groups by dismissing as irrelevant small reductions in the light in a building used for the reading of books. The new building will have a negative visual and overshadowing impact on the synagogue and its setting and context within the City townscape. Pile driving during construction may cause damaging vibrations.

I am against this planning application.

Yours sincerely

[redacted]

Rabbi Dr Michael Hilton

From:	Alfred Magnus
To:	lpaburystreet
Cc:	Tastsoglou, Anna
Subject:	Re: Planning application reference: 24/00021/FULEIA.
Date:	08 May 2024 12:08:01

THIS IS AN EXTERNAL EMAIL

Dear Shupi,

Thank you for your email and I apologise for not providing complete details and for your information my address is:

Alfred Magnus
7 Garden Court
Garden Road
London
NW8 9PP

Regards,

Alfred

Alfred Magnus
[redacted]
Tel: [redacted]
Mob: [redacted]

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Date: Wednesday, 8 May 2024 at 12:03
To: Alfred Magnus [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Planning application reference: 24/00021/FULEIA.

Dear Alfred Magnus,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Alfred Magnus [redacted]
Sent: Wednesday, April 17, 2024 10:10 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Many of us in the S & P Congregation were very upset to learn there has been yet another Planning Application for a 45 storey building at 31 Bury Street even though it has been agreed this is now a Conservation Area. This building if allowed will completely overshadow the Bevis Marks Synagogue and take away its light.

I write to express my strong opposition to this new application (24/00021/FULEIA).

I am a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.

- **A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.**
- It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?
- **It would destroy the southern sky view, which is an essential part of the setting of the synagogue**, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.
- The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place.
- **It would overshadow the synagogue and its courtyard** for much of the day, reducing the useability of the courtyard for rituals and celebrations.
- It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because

of the historic nature of the synagogue, installing additional electric lighting is not feasible.

- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.
- The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025.
- **The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny.** Many –for example, being car free, demonstrating holistic environmental design, having consolidated deliveries –are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.
- They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism.
- The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.
- The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.
- The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority.

I do hope you will be able to refuse consent for this unsuitable building

Yours sincerely,

Alfred Magnus (Former Chairman of the Board of Elders of the Spanish & Portuguese Jews Congregation.)

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: planning application reference: 24/00021/FULEIA
Date:	07 May 2024 10:38:51
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA. Can you please register it on uniform and upload online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Dennis Baum [redacted]
Sent: Sunday, May 5, 2024 10:53 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: planning application reference: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou

I'm writing to express my strong opposition to this new application (24/00021/FULEIA).

I'm not a member of Bevis Marks' Spanish & Portuguese Jewish community but I am the Chairman of the Southend & Westcliff Hebrew Congregation and many members of the Bevis Marks' Spanish & Portuguese Jewish community have retired to live in Southend and Westcliff, just a short train journey away.

I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in
keeping with the conservation of a Grade-1 listed building, which is now also in a

conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.

I urge you to refuse this application.

Regards

DENNIS BAUM
Chairman – Southend & Westcliff Hebrew Congregation
Synagogue Office, Finchley Road, Westcliff-on-Sea. SS0 8AD
Shul Office: [redacted]; Mobile: [redacted] email: [redacted]

This e-mail (and any attachments) may contain privileged and/or confidential information. If you are not the intended recipient please do not disclose, copy, distribute, disseminate or take any action in reliance on it. If you have received this message in error please reply and tell us and then delete it. Should you wish to communicate with us by e-mail we cannot guarantee the security of any data outside our own computer systems. For the protection of our systems, incoming emails will be automatically scanned.

Begum, Shupi

From: Jude Goffe [redacted]
Sent: 08 May 2024 12:30
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: Latest application Bevis Marks

THIS IS AN EXTERNAL EMAIL

Happy for name & address to be revealed.

Jude Goffe - Jamaica Buildings, St Michael's Alley, London EC3V9DS

JG

> On 8 May 2024, at 12:12, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Jude Goffe,
>
> Thank you for your email. I can confirm receipt of your objecOon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecOon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaOon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
>
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaOon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hΣps://gbr01.safelinks.protecOon.outlook.com/?url=hΣp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Cf72429cfa1184a2a70da08dc6f5249ï %7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638507646424581454%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=TV7W4K1brCTy3ZHyUaed5SsOD94GBmIytdBAUE5g9dk%3D&reserved=0
> Juliemma McLoughlin
> ExecuOve Director Environment
>
> -----Original Message-----
> From: Jude Goffe [redacted]
> Sent: Sunday, April 21, 2024 5:48 PM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: Latest applicaOon Bevis Marks
>
> THIS IS AN EXTERNAL EMAIL
>

>
> Here we go again. Another damaging applicaƟon.
>
> I object to the latest applicaƟon for the following reasons:
>
> 1 This new applicaƟon has hardly changed from the last Ɵme. It is cynical, and as inappropriate as the earlier rejected applicaƟon. The new tower would be far too dominant over the synagogue, blocking out what liΣle light there is.
>
> 2 I would argue that Bevis Marks should be regarded in the same way as St Paul's - iconic, extremely important, a "Cathedral" to the Jewish faith. I doubt if a similar proposal would be allowed close to St Paul's.
>
> Please do not allow this applicaƟon.
>
> Regards
>
>
> JUDE GOFFE
> Local resident in the City of London.
> EC3V9DS
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY
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> of monitoring. All liability for errors and viruses is excluded.
> Please note that in so far as the City of London falls within the
> scope of the Freedom of InformaƟon Act 2000 or the Environmental
> InformaƟon RegulaƟons 2004, it may need to disclose this e-mail.
> Website:
> hΣps://gbr01.safelinks.protecƟon.outlook.com/?url=hΣp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Cf72429cfa1184a2a70da08dc6f5249ï %7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638507646424589420%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
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> a=bpFv2LrHeZ3fJwoS9%2BZirgf%2FPrVHpZh1E7fZqf7x%2BIo%3D&reserved=0

Begum, Shupi

From: Adam Musikant [redacted]
Sent: 08 May 2024 13:11
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Good afternoon Shupi

home address

215 Goldhurst Terrace
London NW6 3ER

many thanks

Adam

On Wednesday, 8 May 2024 at 13:00:08 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Adam Musikant,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Adam Musikant [redacted]
Sent: Monday, April 22, 2024 7:27 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Good morning Ms Tastsoglou,

I am one or the original trustees that worked on the project for the new education and heritage centre. I am so disappointed to have seen the recent proposals and changes from recent policies.

I'm writing to express my strong opposition to this new application (24/00021/FULEIA).

I am appalled to see this new proposal, particularly after its refusal
two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal
would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

Regards

Adam Musikant

[redacted]

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Begum, Shupi

From: Katharine Copisarow [redacted]
Sent: 08 May 2024 16:05
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: planning application reference: 24/00021/FULEIA.
Attachments: image003.gif; image004.jpg

THIS IS AN EXTERNAL EMAIL

Thank you for your acknowledgement and reassurance of data protection.

My full postal address is:
The Granary,
Hoe Lane,
Flansham,
West Sussex.
PO22 8NT

Regards,
K.Copisarow

On Wed, 8 May 2024, 15:16 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Katharine Copisarow,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Katharine Copisarow [redacted]
Sent: Monday, April 29, 2024 2:41 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: planning application reference: 24/00021/FULEIA.
Importance: High

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am writing to register my objection to this latest planning application, ref 24/00021/FULEIA.

It is an audacious proposal, barely changed from the application, which was turned down two years ago. The proposed 45 storey tower would be absolutely devasting, overshadowing the synagogue and its courtyard forever by blocking out the light and sky view which is such an essential part of the setting. Not only is the synagogue a Grade 1 Listed building of immense historical and cultural importance –unique among the great cathedrals of London –it is also of significant national and international importance. The Listing status and the recently added Conservation Area status have been granted specifically for the protection of the building and its setting. This new proposal shows blatant disregard for these official protections.

The planning benefits suggested by the developers are weak and a distraction from the main issue. I hope they are not being offered as trade-off, as nothing could ever make up for the potential irreversible damage that would be caused if this proposal is allowed to go ahead. Please, please, please refuse this this application.

Although I am no longer a resident in the area my interest remains strong as both a historian and a regular visitor.

Kind regards

Katharine Copisarow MA Oxon

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Begum, Shupi

From: Christine Hills [redacted]
Sent: 08 May 2024 21:08
To: lpaburystreet
Subject: Re: 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Dear Shupi Begum,

Thank you for your reply to my email.
My full address is: Carmel, Upper Kilmacud Road, Stillorgan, Blackrock, Co. Dublin, Ireland. A94 YY33

Kind Regards,
Christine Hills#

On Wed, 8 May 2024 at 15:47, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Christine Hills,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> CITY OF LONDON
>
> Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Christine Hills [redacted]
Sent: Sunday, April 28, 2024 10:29 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

I'm writing to beg you to refuse this new application (24/00021/FULEIA). I am very upset to see this new threat to the Bevis Marks Synagogue which is such a historic building as well as an important one in the present day for Jewish worship. Like many people all over the world I have ancestors who celebrated important religious ceremonies there and when visiting U.K. we make a point connecting. The proposed tower would be a disaster for the synagogue cutting out its light and blocking the view. Given the historical and practical importance of the synagogue I find this proposal totally inappropriate and implore you to refuse it.

Yours sincerely,

Christine Hills

(Descendant of the de Costa family, now living in Ireland)

Yours

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Begum, Shupi

From: [redacted]
Sent: 09 May 2024 10:19
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: Objection to Development at 31 Bury Street (Ref: 24/00021/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Shupi

Thank you for your email and for your detail response.
I can absolutely share my residential address.

Flat 3
4A Norwood Villas
Waterworks Road
Birmingham
B16 9DE

Let me know if you need anything else.

All the best,
Alexander Matthieu
[redacted]

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Wednesday, May 8, 2024 3:18 PM
To: [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Objection to Development at 31 Bury Street (Ref: 24/00021/FULEIA)

Dear Alexander MaΣhieu,

Thank you for your email. I can confirm receipt of your objecϴon.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecϴon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportaϴon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: [redacted]
Sent: Monday, April 29, 2024 10:15 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>; [redacted]
Subject: Objection to Development at 31 Bury Street (Ref: 24/00021/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am writing to express my strong objection to the proposed development of a 48-story office building at 31 Bury Street, located just 25 meters from Bevis Marks Synagogue.

As the oldest continuously used synagogue in Britain, Bevis Marks holds immense cultural significance. The unobstructed southern sky view, allowing for the observation of the stars from the courtyard, is an essential part of the synagogue's heritage and spiritual practice.

The previous attempt at this development in 2020 was rightly rejected due to the un impact it would have on the synagogue. I am deeply disappointed that the developers are persisting with this plan, especially considering the recent designation of the area as a Conservation Area.

The proposed scrapping of the ban on tall buildings in Conservation Areas goes agains purpose of such designation –to protect historically and culturally significant sites. Allow development would set a dangerous precedent and threaten the integrity of Bevis Marks Synagogue.

Therefore, I urge the City of London to reject this application (Ref: 24/00021/FULEIA). Protecting Bevis Marks Synagogue and its unique heritage is paramount.

Thank you for your time and consideration.

Sincerely,
Alexander Matthieu
[redacted]

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Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Begum, Shupi

From: Jonathan Isaacs [redacted]
Sent: 13 May 2024 09:24
To: lpaburystreet
Subject: RE: objection to 31 Bury St. planning application ref:24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms. Begum,
Thank you for your reply to my email. My address is 163 West End Lane, London NW6 2LG.
Kindly acknowledge receipt.
Your sincerely,
Jonathan Isaacs

> On 13/05/2024 08:59 BST lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Jonathan Isaacs,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> CITY OF LONDON
>
> Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Jonathan Isaacs [redacted]
Sent: Friday, April 26, 2024 2:04 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: objection to 31 Bury St. planning application ref:24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

I am a 65-year-old retired Jewish journalist living in north west London and am writing to object in the strongest possible terms to the above-numbered planning application.

I believe it will adversely affect the workings of the historic Bevis Marks synagogue to the point of ruination. I grew up visiting Bevis Marks frequently and also visited on many occasions during my working life in the City of London in nearby Devonshire Square, EC2.

The synagogue is the capital's principal historic Jewish site in regular use, a listed building and the erection of this proposed tower block would obscure its religiously important southern view of the sky and blot out the light on the synagogue's courtyard. It would also shroud religious observance and other activities there in continuous exterior gloom.

Please, please refuse this application.

Yours sincerely,

Jonathan Isaacs

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Begum, Shupi

From: Michael Schiller [redacted]
Sent: 13 May 2024 10:40
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

my address is 40 compton rise, pinner HA5 5HR

On Monday, 13 May 2024 at 10:25:22 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Michael Schiller,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Sent: Wednesday, May 1, 2024 2:50 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: FW: planning application reference: 24/00021/FULEIA.

Hi all,

Another objection that needs to be uploaded on the file please.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)

Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282

anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Michael Schiller [redacted]
Sent: Thursday, April 25, 2024 2:12 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Mrs Tastsoglou

Please accept my objection to the planning application noted above because it would be extremely damaging to the Bevis Marks synagogue, itself a heritage site. the reasons for my objection are set out below.

- **A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.**

- It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?

- **It would destroy the southern sky view, which is an essential part of the setting of the synagogue**, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.

- The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place.

- **It would overshadow the synagogue and its courtyard** for much of the day, reducing the useability of the courtyard for rituals and celebrations.

- It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.

- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.

- The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025.

- **The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny.** Many –for example, being car free, demonstrating holistic environmental design, having consolidated deliveries –are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.

- They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism.

- The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.

- The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.

- The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority.

Yours sincerely, michael schiller

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Begum, Shupi

From: Stanley Gelbier [redacted]
Sent: 13 May 2024 11:36
To: lpaburystreet
Subject: Re: Bevis Marks Synagogue - Planning Application Ref: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Shupi

Sorry about that omission.

My address is:
Holmwood
Dollis Avenue
Finchley
London N3 1UD

[redacted]

[redacted] (for texts as I can't hear speech on phone)

Kind regards
Stanley

On Monday, 13 May 2024 at 10:46:21 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Professor Stanley Gelbier,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Stanley Gelbier [redacted]
Sent: Thursday, April 25, 2024 9:34 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue - Planning Application Ref: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou

I attach my comments on the above Planning Application.

Yours faithfully

Professor Stanley Gelbier

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Begum, Shupi

From: Janice Brent [redacted]
Sent: 13 May 2024 11:48
To: lpaburystreet
Subject: Re: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

My name and address are:
Janice Brent
4 Bythorn Street
London SW9 8AQ

Kind regards,

Janice Brent

On Mon, May 13, 2024 at 11:07 AM lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Janice Brent,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Janice Brent [redacted]
Sent: Wednesday, April 24, 2024 10:45 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

As a non-practising London Jewess, I'm writing to express my strong opposition to the new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

Kind regards,

Janice Brent

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City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Begum, Shupi

From: michaelhillman25 [redacted]
Sent: 13 May 2024 23:24
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Thank you foryour e mail myaddress is
Flat 7, Blake Lodge
64,Hedon Lane,
London N3 1 SB

Kind regards
Michael Hillman

Sent from my Galaxy

-------- Original message --------
From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Date: 13/05/2024 11:06 (GMT+00:00)
To: [redacted]
Cc: "Tastsoglou, Anna" <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Bevis Marks Synagogue

Dera Michael Hillman,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards
Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

-----Original Message-----
From: Michael Hillman [redacted]
Sent: Wednesday, April 24, 2024 1:19 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Anna

Planning application reference 24/00021/FULEIA

I am writing to express my strong opposition to this new application.

I am appalled to see this proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.
this new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade 1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religously important southern sky view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St. Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

Yours faithfully

Michael Hillman

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Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: FAO: CITY OF LONDON PLANNING DEPARTMENT - *CASE OFFICER HERE MS ANNA TASTSOGLOU (PLEASE) - PLANNING APPLICATION REFERENCE: *24/00021/FULEIA
Date:	14 May 2024 10:35:03
Attachments:	image002.png

Hi all,

Can the following objection please be registered on Uniform and uploaded online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted]
Sent: Tuesday, May 14, 2024 10:16 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Fwd: FAO: CITY OF LONDON PLANNING DEPARTMENT - *CASE OFFICER HERE MS ANNA TASTSOGLOU (PLEASE) - PLANNING APPLICATION REFERENCE: *24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Begin forwarded message:

From: [redacted]
Subject: FAO: CITY OF LONDON PLANNING DEPARTMENT - *CASE OFFICER HERE MS ANNA TASTSOGLOU (PLEASE) - PLANNING

APPLICATION REFERENCE: *24/00021/FULEIA
Date: 14 May 2024 at 10:00 BST
To: anna.tastsoglou@cityoflondon.gov.uk
Reply-To: [redacted]

TUESDAY 14/05/2024 MS ANNA TASTSOGLOU - 'NO ACKNOWLEDGEMENT OF MY OBJECTION 13/05/2024 RECEIVED'

Re. Planning Application Reference: *24/00021/FULEIA

FAO: Ms Anna Tastsoglou
*Case Officer
c/o City of London Planning Department
P O Box 270
Guildhall
London EC2P 2EJ

Dear Ms Tastsoglou

Re. Planning Application Reference: *24/00021/FULEIA

Thank you for being the relevant *Case Officer in this, yet another attempt to DESTROY
a most historical and, as far as I know, a **unique portion of the City of London

This not only includes the Grade 1 (one) listed and ***irreplaceable Bevis Marks Synagogue
but, also, what I believed to have become known as the **'Creechurch Conservation Area'

This was certainly the **case when I first looked at the situation on the 5th November, 2023

The latest 'absurd' idea by presumably the same Developer (?) completely goes against the
grain first described by your own City Planners when describing the **Creechurch Conserv-
ation Area encompassing 33 Creechurch Lane, London EC3A 5EB and Bury House, 31 Bury
Street, London EC3A 5AR and, particularly, ***Bevis Marks Synagogue, 2 Heneage Lane, Lo-
ndon EC3A 5DQ

Although now retired, I experienced some 40 (forty) years in Shop and Office agency in the
West End of London W.1., in Piccadilly and Regent Street, after having 'trained' with one of
the largest West End Commercial Agencies. I can honestly say that I have never come acro-
ss such a poorly represented attempt to try and DESTROY such an historic part of the already
famous building(s) together making up the wonderful City of London

My OBJECTION to the Planning Application with Reference: *24/00021/FULEIA is 'heartfelt'

Yours sincerely

Roger Mautner
67 Catherine Howard House
Queens Reach
East Molesey
Surrey KT8 9DE
[redacted]

20 Neeld Crescent
London NW4 3RR
United Kingdom
+44 (0)7968 529609

info@foundationforjewishheritage.com
www.foundationforjewishheritage.com

Trustees
David Bearman
The Lord Finkelstein OBE
Stephen Goldman
Dame Helen Hyde DBE
Prof. David Latchman CBE
The Rt. Hon. Jim Murphy
Daniel Peltz OBE
Esther Robinson Wild
Stuart Roden
Sir Simon Schama CBE
Simon Sebag Montefiore

Chief Executive
Michael Mail

Friends
Anne Applebaum
Father Patrick Desbois
Gunter Demnig
Taco Dibbits
The Lord Fellowes
Colette Flesch
Stephen Fry
Sir Nicholas Hytner
Steven Isserlis CBE
Sir Anish Kapoor CBE
Sarah de Lencquesaing
Bernard-Henri Levy
Daniel Libeskind
James E. Lieber
Senator Joseph I. Lieberman
Hadassah Lieberman
Janusz Makuch
The Rt. Hon. Sir Eric Pickles MP
Steven Pinker
Taleb D. Rifai
The Rt. Hon. Sir Malcolm Rifkind
Olivier de Rohan Chabot
The Lord Sassoon
Timothy Snyder
Edmund de Waal OBE
Jimmy Wales
Debbie Wiseman MBE
The Rt. Hon. Lord Young CH

Ms Anna Tastsoglou
Principal Planning Officer, Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

13.05.24

Dear Ms Tastsoglou

RE: Planning Application: 24/00021/FULEIA
Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

I am writing to register the Foundation for Jewish Heritage's strong objection to the above application. Our objection relates to the negative impact that the proposed development would have on the Grade I listed Bevis Marks Synagogue (NHLE List Entry Number: 1064745). Bevis Marks is the oldest surviving synagogue in the UK and is arguably the most important Jewish heritage site in the country. The Synagogue is of exceptional significance both to the UK's Jewish community and in the history of the City of London, in which Sephardic Jews played a pivotal role.

In respect of the previous application, our trustee Esther Robinson Wild wrote a comprehensive objection dated 01.02.21. All of the points made in this document apply to the new application.

In addition, we would like to make the following points in support of our objection to the new application:

1. The alterations made to the proposal since the previous application do not address the grounds on which it was refused, including the unacceptable impact on the Synagogue. We welcomed the planning committee's refusal of the previous application and can see no reason for this decision to be undone by the new application. Indeed, the subsequent creation of the Creechurch Conservation Area and the widening of the new proposal's footprint strengthen the case for refusal.

2. The Foundation's previous objection stated that we expected a robust and thorough assessment of the significance of a Grade I listed heritage asset which may be impacted by a major development of this nature and that we were concerned by the absence of such. We remain concerned that no such assessment has been adequately carried out.

   The Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment submitted with this application includes a single page heritage assessment devoted specifically to Bevis Marks Synagogue (sections 8.124-8.139). It includes no attempt to assess the evidential or communal significance of the site, points raised in our previous objection. The assessment is incomplete and inadequate for a Grade I listed site of outstanding historical interest.

We again call for a thorough Statement of Significance for Bevis Marks Synagogue to be prepared along with a robust assessment of potential harms to significance caused by the proposed development.

3. We fundamentally disagree with the assumption of the heritage assessment that the setting of Bevis Marks Synagogue makes no contribution to its significance, and that therefore the proposed development would result in 'no harm' to significance. We fully support Historic England's position that the setting does in fact contribute to the significance of the Synagogue. We believe that the proposed development will cause **substantial harm to the setting of Bevis Marks Synagogue.**

4. The proposed development sits within the Creechurch Conservation Area, which was created in part to achieve '*Fuller recognition of the Jewish history of the locality'* (Creechurch Conservation Area Proposal, City of London Corporation, December 2023). The application must be determined in accordance with the City of London Local Plan 2015. Core Strategic Policy CS14: Tall Buildings clearly states that the City will **refuse planning permission for tall buildings in conservation areas.**

   The proposed development would contravene both CS14 and DM12.2 which states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

5. The proposed development would mean that the Synagogue's courtyard would be **overlooked to an unacceptable extent**. The visualisation of the view from the courtyard submitted with the proposal (Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment, View 45a proposed, pp211-212) shows how there would be views into the courtyard from the majority of floors of the proposed Bury House.

   The Synagogue courtyard was designed as a **secluded, peaceful and private space for spiritual practice.** and has been used in this way for three centuries. The overlooking of the courtyard would represent a very substantial change to the privacy and intended atmosphere of the space.

   While we agree with the Environmental Statement that the change to the view from and into the courtyard will be 'large', we **strongly disagree** with the assessment of the view as being of only 'medium' sensitivity, and find it difficult to understand the conclusion that the effect would be 'moderate' and 'beneficial'.

6. The Foundation for Jewish Heritage is concerned with the conservation of Jewish built heritage. It is not a religious organisation; therefore we defer to the congregation of Bevis Marks Synagogue in assessing the impact of the proposal on their religious practice. We fully support the congregation's position that the proposed development would have a **serious, negative impact on their ability to carry out religious rituals**.

We hope that the reasons for our objection will considered in your determination and would welcome the opportunity to provide further comments if needed.

Yours sincerely,



Katherine Findlay
Projects Officer

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue 24/00021/FULEIA.
Date:	14 May 2024 10:37:16
Attachments:	image002.png

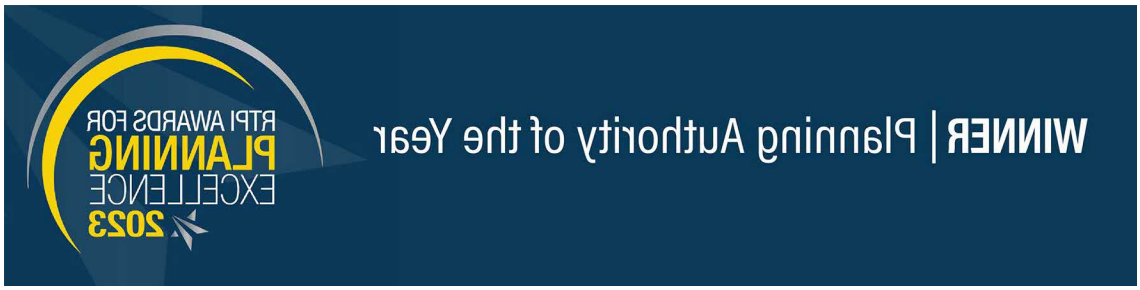
Hi all,

Can the following objection please be registered on Uniform and uploaded online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Daniel Halfon [redacted]
Sent: Tuesday, May 14, 2024 7:20 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

The ancient synagogue at Bevis Marks has been a source of spiritual light to London and the entire country since its opening in 1701. In addition to holding daily and Sabbath services, it is the place where for over three centuries the Jewish community has come to offer prayers to the Almighty in thanks and commemoration of national events, and in recognition of the hospitality shown by Britain towards them.

I implore you not to allow this source of spiritual light to be deprived of the physical light which sustains it and is so crucial to continuing its unique role in the life of the British Jewish community and the country as a whole.

Yours sincerely,

Daniel Halfon

Mobile [redacted]
Studio

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objection to 24/00021/FULEIA
Date:	14 May 2024 10:52:41
Attachments:	image002.png

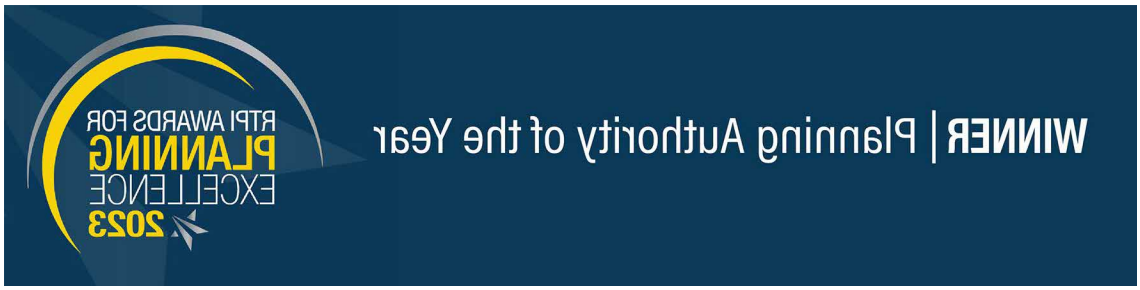
Hi all,

Can the following objection please be registered on Uniform and uploaded online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Naomi Klionsky [redacted]
Sent: Tuesday, May 14, 2024 7:16 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ma'am,

It has come to my attention that a proposal has once again been submitted for a construction project for a 43-storey building at the site of Bury House in the Conservation Area.
While I truly share the value of dense housing to meet the needs of the city of London, I also place immense value on the preservation of the historic synagogue at Bevis Marks, which would be impacted drastically if this skyrise were to be approved.
The synagogue has for literally hundreds of years remained lit only by natural lighting and candles, which would become an impossibility in the shadow of the tower. This would be a tragic loss to the entire community.

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: 24/00021/FULEIA.
Date:	14 May 2024 11:08:41
Attachments:	image002.png

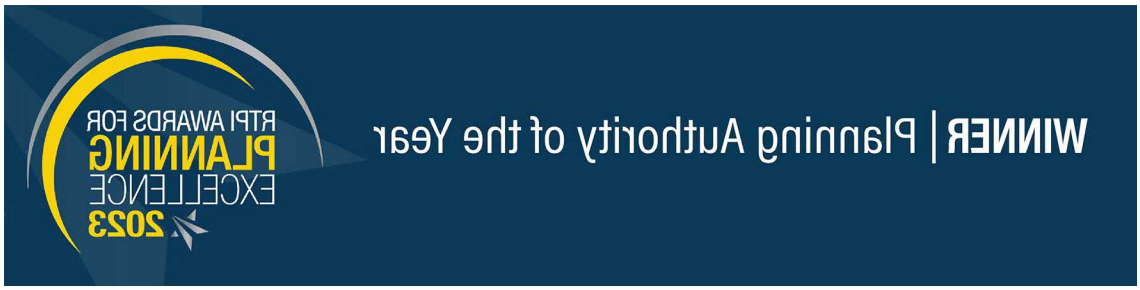
Hi all,

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Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Michael Roodyn [redacted]
Sent: Monday, May 13, 2024 6:24 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou
Re. Bevis Marks Synagogue (BMS)

Along with others, I should be most grateful if you could note my objection to this planning application.

1. BMS is the oldest synagogue, or certainly one of the very first to be established for Jews coming to England to avoid

persecution. Of this I'm sure you are well aware.

2. It has an unique and emotive place for most Jews in this country. It is if you like the equivalent of the White Cliffs of Dover, or better the iconic photo of St Paul's Cathedral taken during the Blitz 54 years ago.
3. In its long and timeless history many famous Jewish people prayed there, including Benjamin Disraeli, the first and only Jewish Prime Minister, so far.
4. You may possible have heard of Samuel Pepys https://en.wikipedia.org/wiki/Samuel_Pepys he was a well known 17th/18th century diarist who paid a visit to BMS during one of the Jewish Festivals.

Here endeth the history lesson, now back to the future.

You will have already read the long list of objections to this plan and in order not to waste your valuable time I shall not repeat these sound valid objections based both on historical and environmental reasoning.

I do hope you will weigh carefully and considerately my opposition to this proposed development and would like to thank you for reading this E mail.

With all good wishes

Michael Roodyn

PS Our daughter held a senior position like you in planning for the LB's of Barnet and Islington!

Michael Roodyn

From: Tastsoglou, Anna
To: [redacted]
Subject: FW: Objection to 31 Bury st development
Date: 14 May 2024 11:10:52

Hi all,

Can the following objection please be registered on Uniform and uploaded online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fda data 05%7C02%7Cjubarysmeet%40cityoflondon.gov.uk%7C1b15323e498546ff31c508dc73fe20ec%7C59e658cdb3cd4056851932221fa06be8%7C0%7C0%7C638512782515231965%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata OppyWSMLvUkqCo4pWcYYNkzoSDdf%2Bk6lGxLy3RgCxiA%3D&reserved 0

-----Original Message-----
From: George-Michael Mourtzilas [redacted]
Sent: Monday, May 13, 2024 5:41 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to 31 Bury st development

THIS IS AN EXTERNAL EMAIL

Αξιότιμη κα Τστσόγλου,
Dear Ms Tastsoglou,
Please accept this email noting my objection to the development of the tower at 31 Bury St they will overshadow Bevis Marks Synagogue.
I urge you to once more reject this proposal and protect this historic place of worship sand the Conservation area.

Yours Truly,
Με τιμή,
Γεώργιος Μιχαήλ Μουρτζίλας
George-Michael Mourtzilas

From: Tasnoglou, Anna
To: [redacted]
Subject: FW: Bevis Marks
Date: 14 May 2024 11:40:09

Hi all,

Can the following objection please be registered on Uniform and uploaded online?

Thank you,

Anna

Anna Tastoglou | Principal Planning Officer (Development Management) Environment Department | City of London | Guildhall | London EC2V 7HH
07711 731282
anna.tastoglou@cityoflondon.gov.uk | https://ghe01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data 05%7C02%7Cjaharyniwer%40cityoflondon.gov.uk%7Cd6d30adfd3874425c5250bfdc740237e4%7C59e658cdb3cd4056851932221fa98be8%7C0%7C0%7C638512800084165670%7CUnknown%7CTWFpbGZsb3dEey JWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata cB3C4hpRbmJ0UZYsvuiMyd%FUKQkFEmQLckqi4C%3D&reserved 0

-----Original Message-----
From: Gerald Bermon [redacted]
Sent: Tuesday, May 14, 2024 10:44 AM
To: Tasnoglou, Anna <Anna.Tastoglou@cityoflondon.gov.uk>
Subject: Bevis Marks

THIS IS AN EXTERNAL EMAIL

PLEASE DONT ALLOW THEBUILDING OF THIS MONSTROUS TOWER OVERPOWERING ONE OF THE CITY 'S-TREASURES.
IT IS AN ABOMINATION.
PLEASE!!!!!!!

Gerald Bermon
[redacted]
Sent from my iPad

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning Application Ref. 24/00021/FULEIA
Date:	14 May 2024 12:01:50
Attachments:	image003.png

Hi all,

Please see below objection from Joint President of the Sephardic Genealogical Society.

Can this please be registered on the file and uploaded online?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted]
Sent: Monday, May 13, 2024 4:11 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning Application Ref. 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

Re: Planning Application Ref. 24/00021/FULEIA - Proposed Development at Bury Street

The Sephardic Genealogical Society ("SGS") is a global network researching the history and genealogy of the Sephardic (Iberian origin) Jewish diaspora. We write to register our objection to the above planning application for the proposed development at Bury Street (the "Proposed Development").

The SGS's primary concern relates to the potential adverse impact of the Proposed Development on the setting and significance of the Grade 1 listed Bevis Marks Synagogue, which is of exceptional historic and architectural importance, both locally and globally. I am some other members of the SGS are members and users of the synagogue, and so write with first-hand knowledge.

Relevant Policy Considerations

In considering this objection, we draw attention to the following policies and provisions under the City of London Corporation's City Plan 2040 which are directly engaged:

1. Policy HE1 (1) - Preserving and enhancing heritage assets and their settings is a core objective. The Proposed Development fails to preserve or enhance the special architectural and historic significance of Bevis Marks Synagogue and its setting.

2. Policy HE1 (2) - There is a presumption against granting consent for developments causing harm or total loss of significance to designated heritage assets, unless the public benefits outweigh such harm/loss. As will be addressed below, the suggested "public benefits" are inadequate and fail to outweigh the heritage harm.

3. Policy HE1 (6) - Developments in conservation areas must preserve and enhance the character, appearance and significance of the area and its setting. The Creechurch Conservation Area was established with the goal of protecting Grade I listed buildings like Bevis Marks Synagogue.

4. Policy HE1 (8) - Development in the defined immediate setting of Bevis Marks Synagogue must preserve and enhance the elements of setting that contribute to its significance as a Grade I listed heritage asset.

5. Strategic Policy S21 (6) - Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue and preserve/enhance the historic elements of its setting.

Harm to Heritage Significance

The Proposed Development, by virtue of its mass, scale and proximity, would loom over and overshadow Bevis Marks Synagogue, causing substantial harm to the experience, appreciation and setting of this irreplaceable 1701 heritage asset of the highest grading. The courtyard setting would be permanently compromised.

For congregants with visual impairments, blocking out natural light could render it

impossible to follow religious services, severely undermining the functional role of this "cathedral synagogue." The SGS previously objected to a similar proposal which was rejected.

Failure to Demonstrate Public Benefits

Under Policy HE1(2), if heritage harm is established, the public benefits must be clearly demonstrated to outweigh such harm. The suggested "public benefits" put forward by the developer are entirely inadequate for these purposes:

- Offering inducements to various charities, predominantly located outside the City, does not constitute a genuine public benefit to City residents, workers, user, and taxpayers who would be impacted.

- The developer's approach of engaging a PR firm to solicit support from external parties, rather than consulting the local Bevis Marks community, is cynical and unacceptable.

- No clear public benefits accrue from creating additional office space at this sensitive location.

Conclusion

In light of the above policy conflicts, heritage harm, and lack of substantive public benefits, the Proposed Development clearly contravenes the City Corporation's own policies and objectives under the City Plan 2040 for managing change and protecting heritage assets like Bevis Marks Synagogue.

Furthermore, as a group that models data and works with artificial intelligence, the SGS has concerns that the assumptions underlying the GLA's projections of future office floorspace requirements may be outdated, particularly in light of comments from leaders like Sam Altman of OpenAI regarding potential disruptions to employment in the service sector from AI. Creating substantial new office space risks an oversupply that cannot be easily repurposed, especially given the many other developments already underway in the City. Conversely, not proceeding with this development at Bury Street could prove advantageous by avoiding a glut of vacant office space. This concern is compounded by the imminent opening of a new visitor centre at Bevis Marks Synagogue itself, which will bring more diverse visitors into the area.

We respectfully urge the City Corporation to refuse this application. If, however, they are minded to approve it, the SGS requests a thorough assessment against the policies highlighted, particularly Policy HE1's requirements to (1) demonstrate all efforts to mitigate harm, (2) prove the public benefits outweigh the harm, and (3) show the works are the minimum required.

Please confirm receipt of these representations. We would be grateful if you could keep us apprised of any material developments regarding this application.

Yours sincerely,

David Mendoza



David Mendoza
Joint President, Sephardic Genealogical Society
Tel +[redacted]
Email [redacted]
Web www.sephardic.world
Patreon www.patreon.com/sephardi

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: 24/00021/FULEIA.
Date:	14 May 2024 12:17:01
Attachments:	image002.png

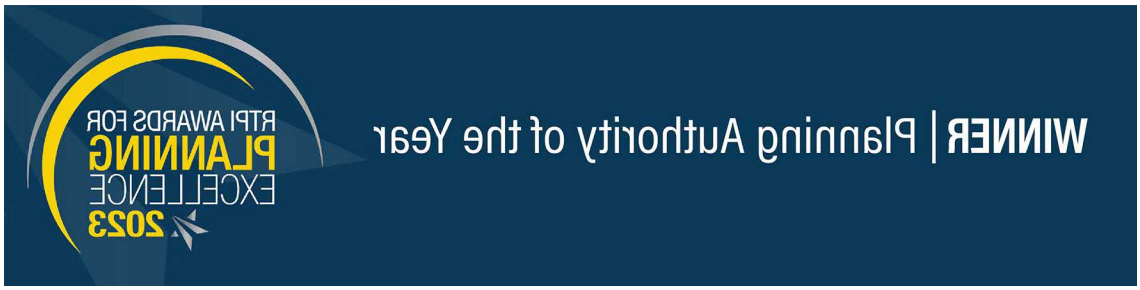
Hi all,

Another objection to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Barbara Rafaeli [redacted]
Sent: Monday, May 13, 2024 12:26 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

The overwhelming numbers of well presented, factual objections online against this insensitive, inappropriate building proposal must prevail.

As anyone with knowledge of London is aware, Bevis Marks is a Grade 1 Listed Building of great historical value to London and the UK generally and continues as a vibrant heritage to the Jewish Community, tourists and the internationally interested public. It will be an absolute desecration to allow a 42 storey tower, as proposed, to overshadow the synagogue, which has a profound religious and cultural heritage, with important, historic significance.

Protecting London's heritage buildings is even more incumbent on Decision Makers in the frenzied onslaught of skyscrapers battering London's historic legacy. Your mission and decision-making is to protect Bevis Marks, *like any other valuable religious and heritage building*, from this crude, destructive proposal. Your responsibility, as trusted protectors of London's historic legacy, is to REJECT this damaging, insensitive and unacceptable proposal.

Many thanks for your consideration,
Barbara Rafaeli

Begum, Shupi

From: Deb [redacted]
Sent: 14 May 2024 12:35
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Apologies, I thought I had included address details.

Deborah Roback
8 Robinswood Mews
N5 1RH

Deborah

> On 14 May 2024, at 12:32, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Deborah Roback,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards

Shupi Begum
Shupi Begum
Planning Administrator|Development Division
<image003.gif> City of London Corporation | Environment Department | Guildhall | London | EC2V
<image004.jpg> 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Deb [redacted]
Sent: Sunday, May 5, 2024 9:58 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris [redacted]
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

To whom it may concern.

I'm writing to express my strong opposition to application 24/00021/FULEIA.

I am a member of Southend & Westcliff Hebrew Congregation but residing in the Borough of Islington, just a few miles from Bevis Marks Synagogue.

I am appalled to see the new proposal, particularly after its refusal two years ago. The new application has barely changed since the last time it was submitted. It is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK.

The new tower, which is to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.

This kind of proposal would surely never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.

I therefore urge you to refuse this application.

Sincerely,

Deborah Roback

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: 24/00021/FULEIA
Date:	14 May 2024 12:50:07
Attachments:	image002.png

Hi all,

Please see below objection to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Lord Leigh [redacted]
Sent: Sunday, May 12, 2024 6:15 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I write to oppose the application for 31 Bury St

|Bevis Marks is one of the most important cultural landmarks in the City

It deserves special attention and protection

My family came to this country in c1790 and I believed they would have worshiped there

The building would be dwarfed by this application and its beauty lost

As a President of another Synagogue , Westminster Synagogue we would be horrified if this happened tour building and are confident Westminster Council would protect us

The siting of the moon and stars are important to us and I cannot imagine the security of the building is improved with this over towering it so that projectiles could be launched from a high rise

I look forward to hearing from you

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Development in Creechurch near Bevis Marks Synagogue 24/00021/FULEIA.
Date:	14 May 2024 12:50:31
Attachments:	image002.png

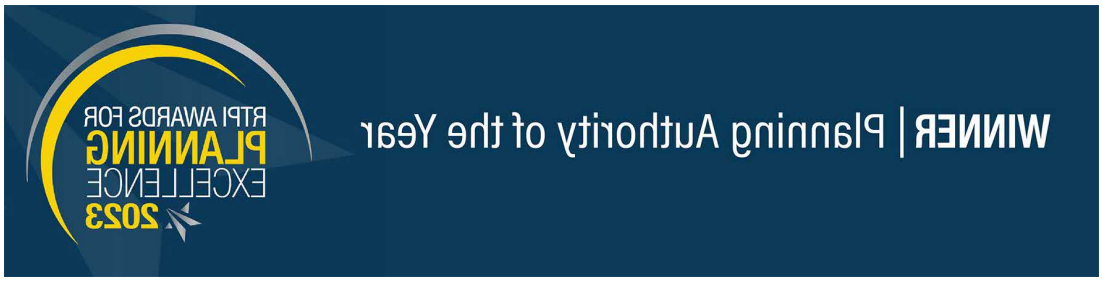
Hi all,

Please see below objection to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted] On Behalf Of [redacted]
Sent: Sunday, May 12, 2024 5:43 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Development in Creechurch near Bevis Marks Synagogue 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

24/00021/FULEIA. I am anxious about this proposed development for several reasons, amongst which are the following:

A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.
It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?
It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.
The proposed building may be well designed and an exemplar of

sustainability, but it is simply in the wrong place.
It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations.
It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.
The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning Objection - 24/00021/FULEIA.
Date:	14 May 2024 12:51:29
Attachments:	Bevis Marks Objection v1.1 2.pdf image002.png

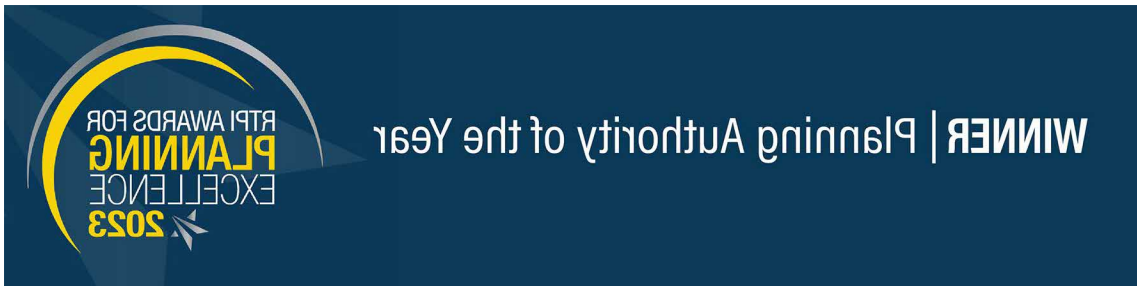
Hi all,

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Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Michael Bear [redacted]
Sent: Sunday, May 12, 2024 4:53 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Michael Bear [redacted] The Rt. Hon. the Lord Mayor Mainelli, Michael (Alderman) <Michael.Mainelli@cityoflondon.gov.uk>
Subject: Planning Objection - 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Please find attached my consultation response on Planning Application 24/00021/FULEIA.

I would be grateful if you could acknowledge receipt of the attached letter.

Such is the importance of the points and issues raised , I am taking this opportunity to copy this response to the Lord Mayor.

Many thanks

Michael Bear

Sir Michael Bear

Former Lord Mayor of the City of London

Sent from the iPhone of Sir Michael Bear

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Your reference 24/00021/FULEIA Bury House, Bury Street, London EC3A 5HR
Date:	14 May 2024 12:51:44
Attachments:	image002.png

Hi all,

Please see below objection to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted]
Sent: Sunday, May 12, 2024 12:43 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Your reference 24/00021/FULEIA Bury House, Bury Street, London EC3A 5HR

THIS IS AN EXTERNAL EMAIL

Dear Madam,

I am writing to register my objection to the proposed development referred to above, of which I have only recently learned. (I also objected to the development previously proposed on this site, for which permission was refused in 2020).

The 45 storey tower now proposed would, in my opinion, seriously damage Bevis Marks Synagogue, every bit as egregiously as the 48 storey previously proposed. The consequential overshadowing of the synagogue and its immediate surroundings would in my opinion ruin the ambiance and presence of what is widely recognised as a building of immense cultural significance to the Jewish community and it relationship with Britain. The diminution of light within the

Synagogue will also likely adversely affect its use.

I cannot imagine any other religious building in London of comparable significance, age and importance being treated in a similar fashion and I find it impossible to conceive of any benefits which might possibly flow from the new building being reasonably thought to justify the enormous damage and harm that new building will cause.

Yours faithfully

Gerald Rothman
34 Ordnance Hill
London NW8 6PU

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue +Planning Application 24/00021/FULEIA
Date:	14 May 2024 12:52:18
Attachments:	image594154.png image656610.png image002.png

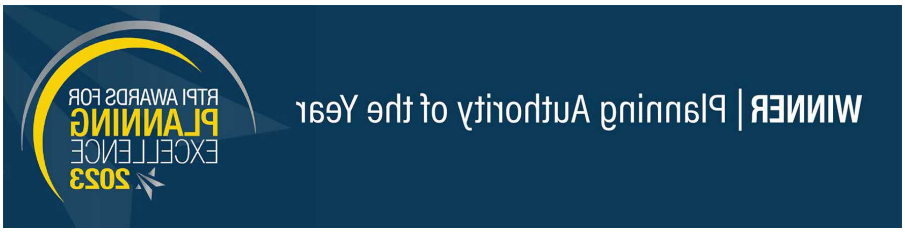
Hi all,

Please see below objection to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Nigel Sloam [redacted]
Sent: Sunday, May 12, 2024 12:20 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue +Planning Application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Sirs

Ref: Planning Application24/00021/FULEIA

I refer to the planning application for a 45-storey tower overlooking the very historic and the City's only synagogue –" Bevis Marks".

I enjoy the Freedom of The City of London (as did my father and does my son) and a member of two of its Livery Companies. I started my professional career in the City and have been involved with its institutions all my working life.

As such, I object strongly to this application on the grounds that:

a. The proposed structure will limit Jewish worship on the site, in an unacceptable manner.

b. It seriously interferes with the light available to Bevis Marks, which has played its part in the Civic life of The City of London.

c. The proposal will impair unacceptably the Synagogue of Lord Mayors and Sheriffs, endowed by Queen Anne frequented by princes and merchants –and which is open for daily prayer.

d. Send a strong signal that the City does not care about freedom of worship for all –and for Jewish worship in particular –as has been noted by and complained of many clergymen of many denominations.

e. Bevis Marks has provided a focal point for both local and visiting Jews, involved in the City. Limiting Jewish worship now will send a clear message at a difficult time that to the City of London, Jews don't matter.

f. The City should be enhancing its special places (Queen Anne recognised this), rather than destroying them.

g. The proposed development simply does not enhance the City –but rather destroys a special place, open to all, which is a glory of the City and reflects its open nature.

I have to say that if Jewish worship at Bevis Marks is restricted unacceptably –as will be inevitable if this application is approved - then my Freedom of The City will become a bitter and inaccurate label –as I and my co-religionists will not be free to practise our religion peacefully in the City as our forebears have done for over 300 years. The City will be diminished and Jews (and others) will take the obvious hint.

Yours faithfully

Nigel Sloam

Nigel Sloam MA FIA ASA TEP C MATH MIMA
Senior Partner
E: [redacted]

Roman House
296 Golders Green Road
London
NW11 9PY

T: [redacted]
F: [redacted]

Nigel Sloam & Co. Roman House, 296 Golders Green Road, London NW11 9PY. Authorised and regulated by The Financial Conduct Authority and regulated by The Institute and Faculty of Actuaries in respect of a range of investment business activities. NSS Trustees Ltd. Registered Office: Roman House, 296 Golders Green Road, London NW11 9PY. Registered in England no: 4141920. Authorised and regulated by The Financial Conduct Authority. NSS Independent Trustees Ltd. Registered Office: Roman House, 296 Golders Green Road, London NW11 9PY. Registered in England no: 4215328. Annandale Financial Management Ltd. Registered Office: 5 Technology Park, Colindeep Lane, London NW9 6BX. Registered in England no: 09308102 NSS Actuarial Monaco S.A.M., Le Mirabel-Suite No 507, 4 Avenue des Citronniers, MC 98000 MONACO. T: +377 97 97 16 70 F: +377 97 97 16 69

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Begum, Shupi

From: Louise Morganstein [redacted]
Sent: 14 May 2024 12:58
To: lpaburystreet
Subject: Re: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

43 Northiam N12 7ET,
Louise

> On 14 May 2024, at 12:37, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Louise Morganstein,
>
> Thank you for your email. I can confirm receipt of your objecOon.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecOon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaOon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
>
> Shupi Begum
> Planning Administrator|Development Division City of London CorporaOon
> | Environment Department | Guildhall | London | EC2V 7HH
> shupi.begum@cityoflondon.gov.uk |
> hΣps://gbr01.safelinks.protecOon.outlook.com/?url=hΣp%3A%2F%2Fwww.c
> ityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.
> uk%7Cf87f7b73ec7347153dï 08dc740d0d67%7C9fe658cdb3cd405685193222ffa96b
> e8%7C0%7C0%7C638512846600105388%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLj
> AwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdat
> a=%2B%2FpVCpIaCD9qhP8cMv5xkhG9n9J7oItb946xEHxsPt4%3D&reserved=0
> Juliemma McLoughlin
> ExecuOve Director Environment
>
>
>
> -----Original Message-----
> From: Louise Morganstein [redacted]
> Sent: Sunday, May 5, 2024 5:41 PM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: 24/00021/FULEIA
>
> THIS IS AN EXTERNAL EMAIL
>
>
> I just wanted to add my objecOons to the proposed development which will severely impact the natural light for Bevis Marks which is an important synagogue for the Jewish community.

> Many thanks for taking the building's historic significance into
> account, Louise Morganstein THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduc-on, copying, distribu-on or other disemina-on or use of this communica-on is strictly prohibited. If you have received this transmission in error please no-fy the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warran-es or inten-on to enter into a contractual rela-onship with the City of London unless specifically indicated otherwise by agreement, le-er or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is poten-ally the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Informa-on Act 2000 or the Environmental Informa-on Regula-ons 2004, it may need to disclose this e-mail. Website: h-ps://gbr01.safelinks.protec-on.outlook.com/?url=h-p%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7Clpaburystreet%40cityoflondon.gov.uk%7Cf87f7b73ec7347153dï 08dc740d0d67%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638512846600116420%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=iDcZqKud2i6zONkdjVPIquYVpTnaluIENs3q6tgeTZk%3D&reserved=0

Begum, Shupi

From: [redacted]
Sent: 14 May 2024 12:59
To: lpaburystreet
Subject: Re: AMENDED COMMENTS FOR PLANNING CONSULTATION 24/00021/FULEIA & 24/00011/LBC (PLEASE IGNORE PREVIOUS EMAIL SENT 30 APRIL 24)

THIS IS AN EXTERNAL EMAIL

Dear Ms Begum

Thank you for your note, apologize for the late reply but I was out of the country attending my grand daughter's wedding.

As per your request please find below name & address:

Anthony N Eskenzi CBE Dsc FRICS
Woodcroft
Totteridge Green
London N20 8PE

If you could confirm receipt of this note and that my details will be used in order to file my comments with regards to this planning appllication I would be most grateful.

With Good Wishes

Anthony Eskenzi CBE DSc FRICS

On Wednesday, 8 May 2024 at 15:39:15 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Anthony Eskenzi,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: [redacted]
Sent: Wednesday, May 1, 2024 12:34 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: AMENDED COMMENTS FOR PLANNING CONSULTATION 24/00021/FULEIA & 24/00011/LBC (PLEASE IGNORE PREVIOUS EMAIL SENT 30 APRIL 24)

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am responding to an email invitation to comment on a new planning application for the erection of a 43 storey tower block in Bury Street which is situated in the Creechurch Conservation Area.

This application is subsequent to an earlier submission for a similar development which after careful consideration was refused by the City.

I am particularly concerned about this application because of the implications and effects on the area and its immediate vicinity.

I should let you know that I served as a Councilman of the City of London for nearly 50 years and I was very much aware of the improvements and developments taking place in the City. Amongst other appointments, I served as founding Chairman of the City's Property Committee.

I spent my whole career in the City of London and as a Chartered Surveyor was Senior Partner in a City firm.

I began working in the City in 1949 and I have been privileged to have seen the City grow from the devastation of WWII to the present excellent balance of new buildings within the City borders.

I have been most supportive of subsequent development of high rise buildings which have been erected in suitable locations. I have taken the opportunity to study the location of the proposed site of the 43 storey tower block and also subsequently visited other tower blocks situated in the Square Mile and then reviewed the information available as a result of these developments.

I have now come to the firm conclusion, after careful consideration that this new proposal, even though there have been certain modifications, should be refused planning permission.

The City has refused permission for this development for a considerable number of reasons stated. The Creechurch Conservation area is congested and the effects of a new high rise building within these close and narrow streets would have a far reaching and highly detrimental effect on the area.

One example of a high rise development is 20 Fenchurch Street, indeed a very attractive looking building, however, when the drawings and plans were submitted many of us drew attention to the possibility of wind disruption and sounds including whistling as well as glare from the outer shell of the building. We were advised at the time that experts had considered this and we were assured that there would be no problems.

However, as we now know, this was not the case and the concerns raised during the application process now effect this area detrimentally.

It is for this reason that I feel I need to draw attention to these particular issues as others also have, in reference to this application, in simple terms I do not want to see this happen again in relation to this important area and to the adjoining historic building (Bevis Marks Synagogue).

I am particularly concerned that the synagogue itself would be affected by the proposed adjoining high rise building which could degrade the thermal environment due to wind turbulence, cooling, heating together with other negative effects.

If we had similar conditions occur on this site in Bury Street this would have a direct effect on the visitors to the synagogue as they congregate outside the building, also pedestrians on everyday business would be affected.

I hope these concerns will be taken into account regarding this new proposal by the City Corporation and once again refuse this application.

Yours sincerely

Anthony Eskenzi CBE DSc FRICS

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Begum, Shupi

From: Jon Rowland [redacted]
Sent: 14 May 2024 13:01
To: lpaburystreet
Subject: RE: Bevis Marks 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Shupi Begum
My address is 65 Hurst Rise Road, Oxford OX2 9HE.
The context is that I visited oUices next door for a meeting and saw Bevis Marks.
Please don't reveal the email address.
Regards
J Rowland

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Tuesday, May 14, 2024 12:52 PM
To: [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Bevis Marks 24/00021/FULEIA.

Dear Jon Rowland,

Thank you for your email. I can confirm receipt of your objecƟon.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protecƟon, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and TransportaƟon CommiΣee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Jon Rowland [redacted]
Sent: Tuesday, May 7, 2024 11:02 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris [redacted]
Subject: Bevis Marks 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Anna
Regarding Bevis Marks Synagogue 1701.
It is with great shame that the City of London should attempt to change the nature of the conservation area of Creechurch in its lurch to maximizing profit.

- The conservation area states that the plan for the adjoining site would breaking the City of London's rules on not allowing tall buildings, Surely there are other places where such a building can be erected, or is the City too interested in money that it will give up it's heritage and damage the area for good.
- Whilst the developer may indicate that it would bring benefits such as being car free, or being environmentally designed, these are everyday requirements that every architect and developer has to achieve. A Georgian building side-by-side with a 45-storey glass and steel box can only be said to be faceless, inappropriate, damaging to the area, and of no relevance to the local community and to the Jewish people who use the synagogue.
- The existing building at 31 Bury street is not very old and could be refurbished to be more sustainable, saving embodied energy and time, let alone Bevis Marks and the conservation area.
- When I was in Savannah I was informed of the Jewish contribution to this country's trade right from the word go as the city was being planned by the English army. It was from Bevis Marks that the Jewish merchants spread out to facilitate the nation's trade. Bevis Marks was and still is the centre of gravity for many Sephardi Jews, those that were allowed in after Cromwell's relaxation of the immigration rules. All very relevant to today. So too is the rise in antisemitism.
- Synagogues rely on light and the ability to look up to the sky. That has been compromised already. Please don't compound that by cutting oU the remaining light. The view of the sky so important for prayer (reading from the Torah is a significant part) and for defining night and day, the sabbath and the ordinary day.
- This is one of the core Jewish centres that is recognized worldwide as a symbol of Jewish presence in this country. It has already suUered inappropriate adjacent development. In the same way that St Paul's (not finished till 1710) has been protected, so too should the City of London protect its heritage.

I hope that the City fathers (and mothers) have the strength to withstand the developers plans and, as in 2022, refuse the application.
Regards
J Rowland

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Begum, Shupi

From: Francesca Raphael Lincoln[redacted]
Sent: 14 May 2024 13:06
To: lpaburystreet
Subject: Re: Planning application (24/00021/FULEIA).

THIS IS AN EXTERNAL EMAIL

45 Summerlee Ave, London N2 9QP, UK

Best wishes
Francesca

On Tue, 14 May 2024, 11:45 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Francesca Raphael Lincoln,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> CITY OF LONDON
>
> Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Francesca Raphael Lincoln [redacted]
Sent: Monday, May 6, 2024 1:47 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris [redacted]
Subject: Planning application (24/00021/FULEIA).

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I'm writing to express my strong opposition to this new application

My parents were married in Bevis Marks synagogue in 1955 and I'm upset to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.

This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

I urge you to refuse this application.

Yours sincerely,

Francesca Raphael Lincoln

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Begum, Shupi

From: Mark Gordon [redacted]
Sent: 14 May 2024 13:26
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: Re: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Apologies, my full address below.

10 Lodwick
Shoeburyness
Essex
SS3 9HW

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Date: Tuesday, 14 May 2024 at 12:35
To: Mark Gordon [redacted]
Cc: "Tastsoglou, Anna" <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: 24/00021/FULEIA

Dear Mark Gordon,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: [redacted]
Sent: Sunday, May 5, 2024 6:45 PM

To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Anna

I would like to object to this planning permission. It was rightly refused 2 years ago and i cannot see what in principle is that different this time.

This is a grade 1 listed building of significance that will be negatively affected including its right to light will be massively affected by this planning application as well.

Kind regards
Mark Gordon
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Begum, Shupi

From: Laura Jacobus [redacted]
Sent: 14 May 2024 14:46
To: lpaburystreet
Subject: Re: 24/00021/FULEIA
Attachments: image004.jpg

THIS IS AN EXTERNAL EMAIL

Of course.
Dr. Laura Jacobus
6, Granville Rd., London N4 4EL.

On Tue, 14 May 2024, 11:46 lpaburystreet, <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Dr. Laura Jacobus,
>
> Thank you for your email. I can confirm receipt of your objection.
>
> However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
>
> In light of the above, please can you provide a full address?
>
> Kind Regards
>
> **Shupi Begum**
>
> 
>
> Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Laura Jacobus [redacted]
Sent: Monday, May 6, 2024 12:41 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

re: application 24/00021/FULEIA

I was extremely concerned to hear of the revived proposal to build this massively tall building in a sensitive location. As an architectural historian and as a Jew I am appalled that such a completely unnecessary development can even be under consideration in a conservation area which is of national significance. The proximity of Britain's oldest synagogue is of major concern, not only because of the inevitable disruption to its religious use, but also because of the potential structural damage to the building's foundations that could ensue.

Yours sincerely,

Dr. L. Jacobus

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contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From: Tastsoglou, Anna
To: PLN - Comment
Subject: FW: Bevis Marks Synagogue - impact of the planning application for 31 Bury Street
Date: 14 May 2024 15:26:08

Hi all,

Another objection for the website.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fdata-85%7C02%7Cjasburystreet%40cityoflondon.gov.uk%7Ce80bd9191e7e4bdd8d6f208dc74219960%7C9fe65fcdb3cd40568519322ffa969e0f%7C0%7C0%7C638512934852661317%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=bHxPOwBn3qqrSMSq2S3e1v9KMtb1FAxRvS1AmD6Y59c%3D&reserved=0

-----Original Message-----
From: Paul Dinsdale [redacted]
Sent: Tuesday, May 14, 2024 3:05 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue - impact of the planning application for 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am writing to raise strong objection to the 45 storey tower proposed for 31 Bury Street.

The tower proposal is just three storeys lower than the 48 storey tower rejected by the Planning Committee in 2021 and the reasons for refusal are as apt today as they were three years ago.

The proposed tower would take natural light away from the synagogue and leave the oldest synagogue in the UK in darkness. You would not permit this desecration of St Paul's Cathedral in this way and you should show the same concern for this historic and much loved City synagogue.

I do not believe that the proposed community benefits' amount to a convincing argument for damaging the setting of this unique City synagogue which is already a centre for both religious and community life.

Finally, Bevis Marks Synagogue is a key part of the Conservation Area and should be afforded full protection. The City Corporation's attempt to water down the Conservation Area as it affects the synagogue is of great concern to many who question the City's motivation for the baffling and highly unusual proposal to protect only the immediate setting' of Bevis Marks Synagogue.

I urge the Committee to reject the planning application for 31 Bury Street.

Yours sincerely

Paul Dinsdalesberg
44 Manor House
Marylebone Road
London NW1 5NP

Sent from my iPhone

ST BOTOLPH
WITHOUT ALDGATE

To: Anna Tastsoglou
Case officer for Bury Street Development

Dear Ms Tastsoglou,

Objection to planning application 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street).

I write on behalf of the St Botolph without Aldgate PCC to object to the above planning application.

Bevis Marks, the only dedicated non-Christian place of worship in the City of London, has been a centre of worship and community for three hundred years. It is more than a 'heritage asset', it has a beating heart of people, many of whose families have worshipped there for generations, some since the synagogue has been built. In recent years the synagogue has been fighting for its very survival.

Building a tower which will cast the Synagogue and its courtyard into shadow, taking away the view of the sky is not merely a matter of light, but also of ritual – of their ability to worship in the building, and of particular importance to the congregation are the prayers at the appearance of the new moon, which they will no longer be able to do if this development goes ahead.

As a neighbouring friend and colleague St Botolph's is keen to support and encourage the congregation at Bevis Marks in their life as a vibrant community, with a future, including their new Education Centre which will bring thousands of school children to the City. We have deep concerns that should this development go ahead, instead of a living community, Bevis Marks will ultimately instead a place of remembrance of the historic Jewish communities in the City.

Yours sincerely,

[redacted]

The Revd Laura Jorgensen
Rector

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application reference: 24/00021/FULEIA.
Date:	14 May 2024 16:28:45
Attachments:	image002.png

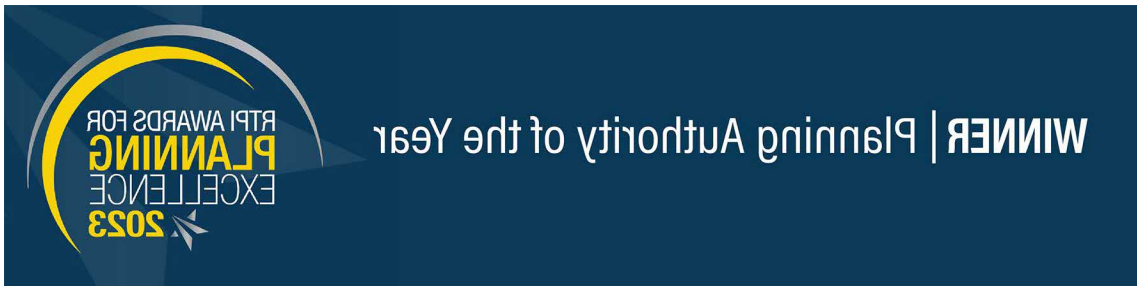
Hi all,

Can the following objection please be uploaded on the file of the application?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: clare brennan [redacted]
Sent: Tuesday, May 7, 2024 6:01 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Anna Tastsoglou,

P.O. Box 270,

Guildhall,

London,

EC2P 2EJ.

anna.tastsoglou@cityoflondon.gov.uk

Planning application reference: 24/00021/FULEIA.

Dear Anna Tastsoglou,

I am sorry to read that the City Corporation is proposing to scrap the ban on tall buildings in Conservation Areas. If the account is accurate, it appears to me that this short-sighted measure will damage the City's invaluable USP – its age and unique architectural landscape. Tall buildings are the norm throughout the world; sites of the historical interest and skyline (even in its present state) of the City of London are rare.

In particular, I am surprised and dismayed to read that the City is considering viewing in a positive light an application for a multi-storey tower to be sited next to the oldest synagogue in continuous use in the UK: Bevis Marks Synagogue. The reasons against this are cultural as well as aesthetic and financial.

Would such a construction be permitted immediately adjacent to St Paul's cathedral (completed 1710)? If not, why is it acceptable to allow one next to this Grade 1 listed building (opened in 1701)?

From the plans, it seems that the multi-story tower would block light from the synagogue – its interior and its exterior. This is a matter of considerable practical, emotional and spiritual import.

Given that the building [at 31 Bury Street] which it is proposed to demolish in order to make way for the multi-story tower appears to be suitable for upgrade at reasonable cost, it is very difficult to understand what practical and reasonable rationale there can be for allowing the construction of the tower.

I trust that the account I have read is mistaken and that the City is not intending to allow the 45-storey tower construction to go ahead.

I write from my present home address, but speak of what I know, having previously spent some years working in the City.

Yours sincerely,

Clare M Brennan

Clare Brennan

From: Tastsoglou, Anna
To: lpaburystreet
Cc: Zdunik, Rafal
Subject: FW: Planning Application 24/00021/FULEIA
Date: 14 May 2024 16:30:41
Attachments: image003.png

Hi all,

Please see below objection re the above application that needs to be uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Brendan Callaghan SJ [redacted]
Sent: Tuesday, May 7, 2024 8:06 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning Application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

I have been unable to complete a comment on your website concerning this planning application – when I pressed submit I was informed that I did not have access**. ["403 - Forbidden: Access is denied. You do not have permission to view this directory or page using the credentials that you supplied.]** Consequently I submit this comment regarding the impact of the proposed building on Bevis Marks Synagogue directly to you. I am a Roman Catholic priest who until recently had responsibility for a Grade One Listed Church building - the Holy Name on Oxford Road, Manchester. In consequence I am aware of how easy it is for the erection of tall buildings to damage the ambience of older places

of worship by reducing the amount of natural light, - and particularly direct light from the sky - entering the buildings concerned. My experience was of 5 or 6 storey buildings adjacent to the Church, and I am astonished that the City of London can be considering approving the construction of a 43 storey building immediately adjacent to Bevis Marks Synagogue.

I hope that this unique and historic building will be maintained in the setting it requires, and not swamped by an inappropriate tower-block. The original decision of the City of London to preserve the setting Bevis Marks deserves was correct, and it should be upheld.

With best wishes

[redacted]

Brendan Callaghan SJ
Superior of Corpus Christi Jesuit Community
757 Christchurch Road
Boscombe
BOURNEMOUTH BH7 6AN
Mobile/cell [& WhatsApp]: [redacted]
Skype: [redacted]

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date:	15 May 2024 11:47:02
Attachments:	image002.png

Hi all,

Please see below objection below that needs to be registered on uniform and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Hannah Clapinson [redacted]
Sent: Wednesday, May 15, 2024 11:17 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

I am writing to make an appeal against the demolition of Bevis Marks Synagogue, a building of great historical importance to London and its Jewish community.

I am absolutely outraged to hear of the following plans:

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Yours sincerely,

Hannah Clapinson

From:	Tastsoglou, Anna
To:	lpaburystreet
Cc:	Zdunik, Rafal; Watson, Davis
Subject:	FW: Objection to 24/00021/FULEIA
Date:	15 May 2024 15:28:58
Attachments:	image002.png

Hi all,

Can you please register the below representation on uniform and upload online?

Please note that it has been requested that the address is removed from the public access.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Andrea Rosen [redacted]
Sent: Wednesday, May 15, 2024 2:07 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Please find my objection below to the scheme at 31 Bury St (24/00021/FULEIA). As I work in mental health, I ask that you withhold my address from the public record for safety reasons. I'm happy for you to have it for the purposes of submission: [redacted]

Best,

Andrea

Re: 24/00021/FULEIA

I am writing today as a City resident, local business owner, and congregant of Bevis Marks Synagogue to state unequivocally my opposition to this development. I have delayed sending this in the hopes that such an ill advised scheme would be withdrawn, but alas, the City continues to try its Jewish community. We have followed the City's procedures in good faith, and at every step the City has changed the goalposts. This scheme in practically the same form was already rejected by the planning committee in 2021, after which we won the protection of a conservation area. (This after the City tried cynically to exclude 31 Bury St from the proposed boundary.) The City is now undermining that conservation area, and all conservation areas, in the new local plan by trying to remove the provision against tall buildings in these protected zones. This shock policy shift of course is wholly in favour of the developers. It calls into question whether any of this has ever been a fair process, or just an ongoing betrayal of the Jewish community's trust.

Bevis Marks Synagogue is the cathedral synagogue of British Jewry, and a site of immense significance both nationally and internationally. It is a 'heritage asset' which the City should be proud of and protect, but it is not only this. It is a living community, unique in the world for its uninterrupted customs, melodies, and traditions, which are specific to this site. The planning committee already determined this scheme would create unacceptable overshadowing and massing in our historic setting. To put us in perpetual shade, make our ritual life difficult if not impossible, and to show our tens of thousands of visitors a year that the City considers us essentially a relic in a glass case, would be a disgrace to the City and a tragedy for the Jewish world.

I urge you in the strongest possible terms to reject this proposal, and to provide real, robust protections for the synagogue in the local plan. Constantly forcing our community to be on the defensive, investing our time, energy and financial resources into fighting ongoing planning battles has begun to feel abusive. The developers will continue to resubmit, trying to exhaust us, and the City has a moral duty of care to prevent this harm, which is now emotional as well as physical. It also has a legal responsibility to protect its minority communities under the Equalities Act.

Towards the end of this year, our new visitors centre will open and tell the story of modern British Jewry, which began here in the City at Bevis Marks. It is a story of partnership and integration, and this should be a story that continues today, and is evidenced to our visitors by the respect shown to us and our historic environment. At a time of soaring antisemitism and hostility, this is more important than ever. Please do what is right and reject this application. Work with us instead to make our community's home a place where we can thrive for centuries to come.

Sincerely,
Dr Andrea Rosen

From: Tastsoglou, Anna
To: PLN - Admin
Subject: FW: Bevis Marks
Date: 15 May 2024 15:52:03

Hi all,

Another objection re 24/00021/FULEIA that needs registering and uploading.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fbevis-marks-synagogue%2Fpages%2Fdefault.aspx&data 05%7C02%7Cjaburystreet%40cityoflondon.gov.uk%7Cc99e0b9f2e5e415833fe08dc74ee93cb%7C3fe658cdb3c04056851932220fa90ae8f%7C0%7C0%7C638513815224885396%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata Wiqn3e%2BAMRpWGDuIOBvZbLqb53YJVb6u4YGaxY0oBik%3D&reserved 0

-----Original Message-----
From: Katie Keeney [redacted]
Sent: Wednesday, May 15, 2024 3:43 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Please can you think seriously about the close proximity of the proposed skyscraper. Bevis Marks is the most beautiful and oldest synagogue in the UK and surely should be protected as with any historical building .
My family fled pogroms in Europe to escape to the safety of the United Kingdom and as Portuguese and Spanish Jews the Synagogue offered them a community and security.
The fact that weddings have been held for decades at the synagogue and that guests can pour out after the ceremony into the sunny courtyard where generations have chatted in the sunlight . It will be pitiful to loose this. The entrance will be in the shade and overshadowed which in my opinion is awfully sad.
Please think seriously about an ugly unnecessary skyscraper blocking the light and overshadowing the delightful courtyard for future generations and visitors . There are multi denominational school trips on a regular basis .

Thank you,
Katie Keeney

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application 24/00021/FULEIA
Date:	16 May 2024 12:15:21
Attachments:	image002.png

Hi all,

Please see below objection to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Sara Kyte [redacted]
Sent: Thursday, May 16, 2024 11:37 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning application 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am very concerned about the proposed planning application which would effect the historical landmark of Bevis Marks Synagogue.

I attended the synagogue last week for a wedding and it is a truly special place, filled with history - for UK, London and the Jewish community.

Please do not approve any building application that would effect this beautiful and important historical site.

Thank you

Sara Kyte Lester
34a Holly Park
LONDON
N3 3JD

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objection to 24/00021/FULEIA, 31 Bury Street
Date:	16 May 2024 12:55:50
Attachments:	image002.png

Hi all,

Please see below objection re the above application that needs to be registered and upload online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted]
Sent: Wednesday, May 15, 2024 4:08 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to 24/00021/FULEIA, 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

I have a close association to Bevis Marks as I was married there and have regularly attended services at the synagogue.

I wish to object strongly to the proposed development at 31 Bury street. The new application is hardly changed since the previous one was rejected some 2 years ago.

Bevis Marks is a unique, Grade-1 listed building, being the oldest working synagogue in the UK and the Cathedral Synagogue of the United Kingdom.

The massive size of the development will overwhelm the synagogue and block out the sky.

The cumulative effect of this and other developments will be to block out the sun from 9AM to 4PM which will have a very detrimental impact on services including weddings - Bevis Marks is renown for its wonderful stained glass windows which need sunlight to be viewed.

Please reject this inappropriate development.

Best regards,

Paul Arwas
57 Pottery Lane
London
W11 4LY

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Opposition - 24/00021/FULEIA
Date:	16 May 2024 13:01:11
Attachments:	image002.png

Hi all,

Please note the following objection re the above application. Address is provided below.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: André Filipe [redacted]
Sent: Wednesday, May 15, 2024 7:43 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Re: Opposition - 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Hello Anna,

Apologies for the multiple messages - I forgot to include my address, in case this is required for my objection to go on the record:

I live at Flat 1 ,12 Ingram Road, N2 9QA
I work in the City at 2 New Street Square, EC4A 3BZ

Regards,

André

From: André Filipe [redacted]
Sent: 15 May 2024 07:33
To: anna.tastsoglou@cityoflondon.gov.uk <anna.tastsoglou@cityoflondon.gov.uk>
Subject: Opposition - 24/00021/FULEIA

Dear Anna,

I write to express my strong opposition to the recent development application 24/00021/FULEIA. I have done so years ago with another similar proposal, for the same reason:

The obstruction of natural light to Bevis Marks synagogue due to the proposed development raises legitimate concerns. While it may seem like a minor detail to some, the uninterrupted flow of light into the synagogue is integral to its regular functioning and the overall atmosphere within.

Bevis Marks is not just a historical relic; it's a living testament to the enduring spirit of world Jewry and a symbol of religious tolerance in this country. In too many ways to list, it's a beautiful symbol of redemption with significance that goes beyond the borders of the City and even the UK. It has an underlying emotional and symbolic value to the descendants of those who survived centuries of persecution in Iberia.

Preserving its functionality is essential to maintaining its significance as more than just a museum piece but as a centre of worship and community for centuries to come.

Its elegant discreetness, motivated by historical constraints, should not serve as a green light for authorities to shun its significance. On the contrary, efforts by the City tod elevate its visibility should be undertaken.

For the record, I have no concerns or objections in principle to the development of tall buildings within the City— quite the contrary. However, for the reason mentioned above, this should be considered a no-go area.

My best regards,
André Filipe

From: Tastroglou, Anna
To: [redacted]
Subject: FW: FAO. Ms Anna Tastroglou - p anning applicat on ref 24/00021/FULEIA - Object on
Date: 16 May 2024 13 06 52

Hi all,

Another objection below to be registered and uploaded online.

Kind regards,

Anna

Anna Tastroglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastroglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url hnp%3A%2F%2Fwww.cityoflondon.gov.uk%2Fdata 05%7C02%7Cjabarystreet%40cityoflondon.gov.uk%7Ca6ea76bdd4cb042aadb8400bdc75a063b8%7C59e65dcdb3c4045685193222fa04be8%7C0%7C0%7C638514578918801749%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata gP9cxTOHWS2QXvSPwq1mHs8wBAFQnlvY%2FtY gN9we0%3D&reserved 0

-----Original Message-----
From: Gordon [redacted]
Sent: Tuesday, May 14, 2024 8:59 PM
To: Tastroglou, Anna <Anna.Tastroglou@cityoflondon.gov.uk>
Subject: FAO. Ms Anna Tastroglou - planning application ref 24/00021/FULEIA - Objection

THIS IS AN EXTERNAL EMAIL

Ref.: Planning application reference 24/00021/FULEIA - Bevis Marks Synagogue - Objection

I wish to express my objection to the construction of a 45 storey new building immediately adjacent to the historically significant Bevis Marks Synagogue, founded in 1701 and today a Grade 1 Listed Building Bevis Marks has been in serious jeopardy very recently and for the same reasons being addressed in this email; it seems the previous objections may have now been sidelined to give the construction of the new building a second chance.
If I understand the present situation correctly the new high rise building is to be located within the Cowchurch Conservation Area. I also understand that under present rules high buildings may not be constructed in conservation areas, so herein lies an important and serious conflict with the statutory development plan.
There is surely a more appropriate site for the proposed new high building, which, if given the go-ahead, despite the present rules, would all but engulf and overwhelm this historic synagogue and deny adequate sunlight to it and so greatly impair its ability to continue as a functioning religious building. I am completely certain no such consideration would ever arise were a tall building in very close proximity, such as in this instance, to Westminster Abbey or St. Paul's Cathedral proposed. So why here, and in conflict with the rules ? The new building cannot but jeopardise and diminish the nature of the whole conservation area.
I urge the City Corporation to reject this new application for construction of the new high rise building.

Yours sincerely,

Gordon Shiach

4 Kirkland Court
Station Road
Kinross KY13 8UG

From: Tastsoglou, Anna
To: [redacted]
Subject: FW: 24/00821/Fulkia Demolition of Bury House and erection of new building etc
Date: 16 May 2024 13:05:28

Hi all,

Another objection below to be registered and uploaded online.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management) Environment Department | City of London | Guildhall | London EC2V 7HH
07711 731282
anna.tastsoglou@cityoflondon.gov.uk | https://ghe01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7C%7Cbabeyniwe%40cityoflondon.gov.uk%7C23f8f907dfce646548aa9bdc75a07935%7C59e658cdb3cd4056851932221ffa96be8%7C0%7C0%7C638514579278069259%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=WjOB7PRealf6fIZYXR149FLZ6NUzzyh8ERYfjERvvjk%3D&reserved=0

-----Original Message-----
From: Anthony Woolich [redacted]
Sent: Tuesday, May 14, 2024 7:38 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00821/Fulkia Demolition of Bury House and erection of new building etc

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I am opposed to the above application. This is due to the loss of amenity which would be suffered by the Bevis Marks synagogue which is in the vicinity, not least due to the proposed new building of 43 storeys. That synagogue is the oldest synagogue in the UK and a vital part of Jewish Heritage in the UK.

Thank you.

Anthony Woolich
6 Bishopsgate London EC2N 4BQ
[redacted]
Sent from my iPhone

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks synagogue
Date:	16 May 2024 13:05:57

Hi all,

Another objection below to be registered and uploaded online.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management) Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk

From: Gerrard [redacted]
Sent: Tuesday, May 14, 2024 6:33 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks synagogue

THIS IS AN EXTERNAL EMAIL

Hi,

This historic site that is still in daily use for worship needs protection.

24/00021/FULEIA

Will damage the enjoyment available to use the Synagogue, please protect it.

I could not see how to formally respond.

Gerrard Beenstock
NW4 2HE

Yahoo Mail: Search, organise, conquer

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue
Date:	16 May 2024 13:08:05

Hi all,

Another objection below to be registered and uploaded online.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management) Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk

From: balthazar Florentin-Lee [redacted]
Sent: Tuesday, May 14, 2024 6:02 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Good evening Ms Tastsoglou,

I read that development work is planned next to the historic Bevis Marks Synagogue.

I am sure lessons have been learned from past plans which would have had an irrevocable and negative impact on the character of Synagogue.

It would be greatly appreciated if you could share with me what steps are being taken to ensure such mistakes are not likely to occur again.

Many thanks,

Balthazar Florentin-Lee

NICKIE AIKEN MP
CITIES OF LONDON AND WESTMINSTER

HOUSE OF COMMONS
LONDON SW1A 0AA

Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

14th May 2024

Dear Ms Tastsoglou,

Objection to the development of 31-34 Bury Street

Having considered the latest application to develop 31-34 Bury Street, I believe it must not be granted permission. The proposal would have an unacceptable impact on the oldest continuous synagogue in Europe, Bevis Marks, while also having a detrimental impact on the wider Creechurch Conservation Area.

It is important to consider the significant impact this development would have on Bevis Marks ability to function. The only artificial light sources within the synagogue are candles and a limited amount of electrical lighting that was installed prior to the building being listed. There are also sensitive issues like the recital of a special prayer at the beginning of each lunar month which would be lost as they require a view of the eastern and southeastern sky.

The previous planning application for this site was refused because "*The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development*". I do not see any reason why this new proposal would not still adversely affect Bevis Marks.

In the Heritage Assessment of the previous application, it states "*were the proposed development to be allowed it would render the designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise*".

Now that the site does firmly sit within the newly created Creechurch Conservation Area, and as the plans do not significantly change from the previous application, I do not see how this development can be permitted.

This development would cause substantial harm to the surrounding Creechurch Conservation Area and must not be allowed to go ahead.

Yours,

[redacted]

Nickie Aiken MP
Cities of London and Westminster

020 7219 4553 nickie.aiken.mp@parliament.uk www.nickieaiken.org.uk
@twocitiesnickie on Facebook, Instagram, Twitter and YouTube

Melody Salem
Chair
Bevis Marks Synagogue Heritage Foundation
119-121 Brent Street
London NW4 2DX

10th April 2024

Dear Melody Salem,

Bevis Marks Synagogue, 2 Heneage Lane EC3 (HG-16-06740)

I am writing to you to set out the investment that The National Lottery Heritage Fund has made to date in the restoration of Grade-I listed Bevis Marks Synagogue, and our reasons for making this significant financial commitment.

Our Committee for London & South awarded a grant of £2,799,400 in June 2019 to the Bevis Marks Synagogue Heritage Foundation towards a £5.8million, five-year project.

In making a grant award of this magnitude, the Committee recognised the high heritage importance of the building alongside the integrity of its historic setting. As a much loved community asset, the Synagogue is also of huge significance to the story of Anglo-Jewish heritage. The project was considered to deliver a number of heritage and community benefits, which were collectively seen as real strengths in attracting National Lottery funding. For example:

- Repairs to the Grade I-listed Synagogue will help to secure its physical future;
- Access improvements will be made, not only benefiting the congregation but also improving the welcome for visitors, widening and increasing access to the building and sharing its story with new audiences;
- Work to the historic undercroft will provide a secure and atmospheric space to display the Community's treasures including its important and unique silver connection, much of which has never been shown to the public;
- Work to the annexe will create space for an exhibition, enabling the history of the Synagogue and its community to be told through objects, oral histories and a digitised archive. It will also provide a new learning space and a detailed activity plan aims to deliver a schools programme.
- A strong community learning programme will be delivered, both on site and in partnership with other local organisations, and a structured volunteering programme for community members, local residents and city workers;
- The project will also enable an expansion of operations supporting a new, sustainable and resilient business model.

We are pleased that work continues, and that the Synagogue was successful in attracting Government support of £496,900 through the DCMS Capital Kickstart programme, which is helping to cover project cost increases caused by COVID-19 related delays.

We very much look forward to seeing the Foundation progress this hugely important project that will help protect, preserve and welcome new audiences to a key cultural asset and landmark in the City of London.

Yours sincerely,



Stuart McLeod
Area Director, London & South

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: R:E: Bevis Marks Synagogue - Opposition to planning application - 24/00021/FULEIA
Date:	16 May 2024 13:25:35
Attachments:	image002.png

Hi all,

Another objection to be uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Simon Lyons [redacted]
Sent: Tuesday, May 14, 2024 2:05 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: R:E: Bevis Marks Synagogue - Opposition to planning application.

THIS IS AN EXTERNAL EMAIL

Dear City Corporation,

R:E: Bevis Marks Synagogue - Opposition to planning application.

I am writing to formally object to the new application (24/00021/FULEIA). As [a member of the Bevis Marks Spanish & Portuguese Jewish community / a concerned citizen], I am profoundly concerned about this proposal, particularly given its previous refusal two years ago and the recent establishment of the Creechurch Conservation Area.

Bevis Marks Synagogue, built in 1701, is the oldest synagogue in continuous use in the United Kingdom and is a Grade I listed building, a status denoting it as a structure of exceptional interest. This status is reinforced by the Planning (Listed Buildings and Conservation Areas) Act 1990, which mandates that any new development must preserve the character and appearance of the area. The proposed development fails to comply with this legal requirement.

The proposed tower, situated immediately to the south of the synagogue, would severely impact its setting, which includes blocking the religiously significant southern sky-view essential for the synagogue's spiritual practices. The synagogue's architecture is designed to maximize natural light, and this new construction would cast a shadow over the synagogue and its courtyard, diminishing the light essential for its function and heritage.

Such a proposal is inconceivable within the vicinity of St Paul's Cathedral and should similarly be prohibited near Bevis Marks Synagogue, often referred to as the "Cathedral Synagogue" of British Jewry. The National Planning Policy Framework (NPPF) emphasizes the importance of conserving heritage assets, and this application starkly contradicts these principles by threatening the very fabric of an irreplaceable cultural and religious monument.

Furthermore, the synagogue has served as a center for Jewish life in the UK for over 300 years, with significant historical figures, including Sir Moses Montefiore and Benjamin Disraeli, having worshipped there. The proposed development would not only disrupt the synagogue's physical integrity but also its historical and cultural legacy, which is a vital part of the UK's diverse heritage.

I urge you to refuse this application in accordance with the statutory protections afforded to Grade I listed buildings and conservation areas, as well as the principles outlined in the NPPF.

Thank you for your consideration.

Sincerely,

Simon H Lyons
16 Grosvenor Crescent | Belgravia | London SW1X 7EP
Phone: [redacted]
Fax:
Mobile

This e-mail is confidential. If you are not the intended recipient, you should not copy it, re-transmit it, use it or disclose its contents, but should return it to the sender immediately and delete the copy from your system.

From: Tasmoglou , Anna
To: [redacted]
Subject: FW: 24/00021/FULEIA
Date: 16 May 2024 13:30:44

Hi all,

Another objection to be uploaded online.

Thank you,

Anna

Anna Tasmoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tasmoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fdata 05%7C02%7Clpaburystreet%40cityoflondon.gov.uk%7C910c51c49bcf94d240d920fdc75a4000b%7C9fe658cdb3cd4056851932225ffa065e8%7C0%7C0%7C638514594435516667%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata NZRZI2bRCxtHPq%2FULAQy7tNZ07wsRhtfNgYBvkdNvyXU%3D&reserved 0

-----Original Message-----
From: Hope Samuel [redacted]
Sent: Tuesday, May 14, 2024 12:48 PM
To: Tasmoglou, Anna <Anna.Tasmoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tasmoglou

I am writing to object to the proposal to demolish Bury House and erect a new building comprising 4 basement levels, ground plus 43 storeys.

From what I understand this proposal would have a seriously detrimental effect on Bevis Marks synagogue, putting at risk the actual structure of this Grade 1 listed historic building and its functioning as a place of worship, education and cultural activity.

I am familiar with Bevis Marks Synagogue, having attended services there over many years. It is a beautiful building and important for the Jewish community as an active place of worship, in use for the last 300 years, and as a living symbol of the Jewish presence in the UK. It is important for the wider community too, illustrating the history of London and immigrant populations, as well of being of architectural significance.

The synagogue enjoys natural light, and indeed the windows and the quality of the light are an essential part of the aesthetics and functioning of the building , and the building proposal looks as if it will seriously compromise this. The development would also seem to directly contradict the various existing and planned heritage and conservation policies for the City of London. Giving planning permission would make a mockery of the serious attempts to protect London's historic buildings and the environment.

I hope that you will take my concerns seriously and that the planning proposal will be rejected.

Yours sincerely

Hope Samuel

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue
Date:	16 May 2024 15:27:58
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Keith Miles [redacted]
Sent: Saturday, May 11, 2024 8:54 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Madam
As a Freeman of the City of London and a longtime worker in the City I strongly object to the plans to overshadow the synagogue with a tower block.
Not only is the synagogue of cultural significance as the oldest synagogue in continuous use but it is also a symbol of the tolerance of the early 18th century that resulted in its existence.
If anything should be done the space around it should be opened up to the general public.
The plan is a form of cultural vandalism.
Yours faithfully

Keith Miles

Keith Miles OBE FCA FRSA MA

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Building behind Temple
Date:	16 May 2024 15:40:15
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Ted Epand [redacted]
Sent: Friday, May 10, 2024 10:31 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Building behind Temple

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastoglou,

I am an American who has heard that the City of London is considering changing its original finding, and allowing the building of a skyscraper behind the Temple that has been in continuous use since the 1700's.

I will also say that although I have been to England several times, there are still trips I want to take there. I had to cancel a British Isles cruise over several consecutive years due to Covid. But what makes it less likely for me to visit your great nation is the attitude that has developed over the treatment of your Jewish citizens.

Although it is not your personal fault, the press that England is receiving is definitely anti-semitic

in nature. [redacted] Then I hear that you will overlook the importance of a symbol of Jewish renaissance in post-racist Britain (I'm referring to the 1300's when Jews were forced out of England) and my mind is filled with rage. Why should I ever again want to visit a country that insults my very existence?

Hopefully, there is a way for you to alter this potential tragedy. Every decision, no matter how small, contributes to a whole. Please analyze your situation, and make a stand for civilization to retain what is best, no matter the cost. Please do not block the sunlight from this historic building.

Sincerely,

Ted Epand
Las Vegas, NV. USA

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Ref: 31 Bury Street, Application reference 24/00021/FULEIA.
Date:	16 May 2024 15:41:53
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: [redacted]
Sent: Friday, May 10, 2024 5:53 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Ref: 31 Bury Street, Application reference 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am writing to express opposition to application (24/00021/FULEIA).

My ancestors in this country were readmitted into England under the rule of Oliver Cromwell when Sephardi Jews were readmitted in 1656 after being expelled centuries before.

The first synagogue they built after their temporary one was the Bevis Marks synagogue, the oldest continuously used synagogue in Britain and over the centuries, its members have and continue to contribute remarkably to British society.

Bearing in mind the refusal of a previous application a couple of years ago, and the subsequent

adoption of the Creechurch Conservation Area, I am flabbergasted and appalled that this new proposal is now being considered.

Were the site adjacent to somewhere as religiously and historically important and significant as say, St Paul's Cathedral, such a proposal would never be considered, so it follows that this proposal should not be considered, affecting as it would forever, the site of British Jewry's equivalent to St Pauls.

Having read into this application, as an architectural designer myself, I can see that this new application has barely changed since the previous submission, and once again, is not in keeping with the conservation of a Grade-1 listed building, now also in a conservation area. Additionally, as the single most important Jewish site in this country, this submission smacks of a total disregard for precedence and consideration of the Bevis Marks synagogue and its congregation and other visitors.

It is clear and beyond refute that this new tower proposal would totally dominate the site of the synagogue. Crucially, it will block out the southern sky view, something that is an important religious factor. Not only that, but it will also forever cast the entire synagogue site, including the courtyard, into an unacceptably diminished level of light..

As I write above, such a proposal would never be considered if the site were adjacent to somewhere like St Paul's and so I therefore respectfully appeal to you to apply the same standards here and refuse this application.

Yours faithfully,

Steven Winston

From: Tasmoglou, Anna
To: PLN - CCBMAIL
Subject: FW: Bevis Marks Synagogue
Date: 16 May 2024 15:43:03

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tasmoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tasmoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7Cgthurynowe%40cityoflondon.gov.uk%7C42a094895c9c4eb1d43808dc75b67c b6%7C9e5fbcdb3cd40568519322 2ffa9bbe0%7C0%7C0%7C638514673826218882%7CUnknown%7CTWFpbGZsb3dHeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata 9LuoDbWeQoWBqI3GdhgkLLa8sHEcBlmcaPUAaQOw c9c4%3D&reserved 0

-----Original Message-----
From: David Kalev [redacted]
Sent: Friday, May 10, 2024 4:07 PM
To: Tasmoglou, Anna <Anna.Tasmoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Sent from my iPhone

Ref: Planning Application24/00021/FULEIA

I write in relation to the above planning application for a 45 storey tower overlooking our much prized synagogue Bevis Marks which I have been attending since December 1967. My objections are fiscal, moral and emotional. Nowadays capital & profit ride roughshod over anything historical & spiritual. There are now so many skyscrapers in London many of them with vacant office space. And with so many people working from home whether part time or full time I really cannot see the need for another monstrosity blighting our environment. Our beloved Bevis Marks where I am proud to say I was Barmitzvah'd in 1968 has existed for 323 years and has seen off Adolf Hitler & the IRA as well as rife anti Semitism from the Moseley era until today. The fight has never been taken away. Does it take ruthless financiers & developers to achieve what the aforementioned could not ? The answer must be a resounding NO. Please do not be swayed by frivolous excuses and arguments. They do not hold water. Fact is this has been an ongoing issue since the original application for a 47 storey edifice was refused. 2 floors do not make a difference. Please refuse the application on the grounds I have set out above and let our one piece of history remain in peace and in place for another 323 years (at least).

David Kalev

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: 24/00021/FULEIA.
Date:	16 May 2024 15:44:15
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Daniel Levy [redacted]
Sent: Friday, May 10, 2024 12:04 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Re: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Hi Anna,

I just wanted to add my comments on the proposed development next to Bevis Marks Synagogue:

Stance: Object

The proposed storey tower next to Bevis Marks Synagogue is a real concern. The towering structure would cast a long shadow over the synagogue and its courtyard, significantly curtailing their use for rituals and celebrations. Bevis Marks is a Grade 1 Listed monument of profound historical and cultural value. It's utterly incomprehensible that we wouldn't shield it with the same zeal as we do St. Paul's Cathedral. If erecting such a colossal building next to St. Paul's is

deemed inappropriate, then it stands to reason that Bevis Marks Synagogue deserves equal protection. The disparity in how we treat these historical treasures should not exist.

Thanks,
Daniel

M: [redacted]
E: [redacted]

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue
Date:	16 May 2024 15:46:01
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Russell Kett [redacted]
Sent: Friday, May 10, 2024 11:30 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

Re: planning application reference: 24/00021/FULEIA

I am writing to you as the case officer in relation to the above planning application to register my considerable concern over the plans to emasculate this historic, Grade 1 listed building by developing a 45-storey tower, which will completely overwhelm the synagogue and its courtyard. It is also conceivable that this dominance will overshadow both the interior of the synagogue and its courtyard, thereby reducing the ambient light which cannot always be resolved by use of additional electrical installations (which would also not be in keeping with the building's historic nature). It would radically affect the 'atmosphere' such an historic building is

able to create for its religious and social purposes. I note that a previous proposal for a 48-storey building to replace the current five storeys was (rightly) rejected by the City of London planning committee in 2020; this new proposal is no less inappropriate and should be similarly turned down.

Much of central London's development has historically been linked to preserving views of St Paul's Cathedral from different locations. Perhaps you should adopt a similar principle to this proposed development and prevent Bevis Marks Synagogue from being totally dominated by this ill-considered, insensitive and totally inappropriate development?

Yours sincerely

RUSSELL KETT

Russell Kett FRICS
Chairman
HVS - London Office
30 Crown Place
London, EC2A 4EB, United Kingdom

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objection to planning application reference: 24/00021/FULEIA.
Date:	16 May 2024 15:46:17
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: James Burchell [redacted]
Sent: Friday, May 10, 2024 10:57 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tatsoglou

Please treat this letter as a formal objection to planning application reference: 24/00021/FULEIA on the following planning grounds:

- **A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.**
- It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?
- **It would destroy the southern sky view, which is an essential part of the setting of the synagogue**, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.
- The proposed building may be well designed and an exemplar of sustainability,

but it is simply in the wrong place.

- **It would overshadow the synagogue and its courtyard** for much of the day, reducing the useability of the courtyard for rituals and celebrations.
- It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.
- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.
- The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025.
- **The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny.** Many – for example, being car free, demonstrating holistic environmental design, having consolidated deliveries – are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.
- They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism.
- The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.
- The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.
- The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority.

Yours

James Burchell
Co- Founder and Partner
Tellon Capital

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From: Tasmoglou , Anna
To: [redacted]
Subject: FW: Bevis marks synagogue
Date: 16 May 2024 15:07:04

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tasmoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tasmoglou@cityoflondon.gov.uk | https://gb01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7Cpaburystreet%40cityoflondon.gov.uk%7C8a8a617148493c3cfa8f08dc75b70c75%7C9fe658cdb3cd4056851932220fa96be8%7C0%7C0%7C638514676237191725%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=vKgiJPQd32EXPXbhdywse9nu3uePT%2Bp7o8GVKB6AHB0%3D&reserved=0

-----Original Message-----
From: Jacob Loftus [redacted]
Sent: Friday, May 10, 2024 8:38 AM
To: Tasmoglou, Anna <Anna.Tasmoglou@cityoflondon.gov.uk>
Subject: Bevis marks synagogue

THIS IS AN EXTERNAL EMAIL

Dear Anna

Hope all is well

I'm a property developer active in central london. So I appreciate the challenges of urban development and the need for the City to continually evolve! I'm pro development.

But this scheme does not sit right in its context, doesn't respect the history and heritage of the city and would be a major blight. As developers and planners there is always a balance to be struck in dense urban london and I strongly believe this scheme is wrong so would like to flag my objection.

I think the city deserves better! It's far too big, insensitive to the synagogue which contributes a huge piece of history and heritage to the City and needs protecting.

Best
Jacob

Jacob Loftus
[redacted]

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Mark Synagogue
Date:	16 May 2024 15:42:09
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Jonathan Martins [redacted]
Sent: Friday, May 10, 2024 4:48 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Mark Synagogue

THIS IS AN EXTERNAL EMAIL

The synagogue was built in 1701. Twelve years later The Bill of Rights was made official in the country, marking a new departure for our Western values of freedom and democracy. Eighty-eight years later the American Constitution was established, which is still known for advocating for religious freedom. More recently, the International Human Rights and European Human Rights were mainly based on these laws.
When this synagogue was built, Jews were openly executed in Spain and Portugal. Even if they were Catholic converts, but they kept any single of the practices of their ancestors, it meant they would be eligible for execution.
It wasn't until 1976, approximately, that many of the descendants of those Jews, in

Portugal, decided to embrace the faith of their ancestors publicly. While in London, more than three hundred years ago, they could build synagogues and enjoy a free life. Even today, our mayor, Sadiq Khan, has installed over thirty thousand lights for Ramadan in Central London, while in so many countries, religious freedom is far from being a reality.

The most interesting thing is that we are in an era of inclusivity, fluidity, and diversity of any kind. Yet, a synagogue that was built one hundred and eighty years before Tower Bridge, and one hundred and fifty years approximately before Big Ben, seems to be less important than those two emblematic buildings. I wonder if our Western values of freedom and democracy matter, as so many people coming from authoritarian countries, where they can be executed for anything that deviates from the official values, find this to be a sanctuary.

But it is nothing new, as it was already happening in 1701 when this synagogue was built.

So, if the mayor spends money on lavishly celebrating Islam, why aren't we allowed to keep a historical building? Older than Tower Bridge and Big Ben?

If a symbol of the city and the values of the West receives such poor treatment, I wonder what is coming next.

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Protect Bevis Marks
Date:	16 May 2024 15:47:21
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Naomi Verber [redacted]
Sent: Friday, May 10, 2024 8:33 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Protect Bevis Marks

THIS IS AN EXTERNAL EMAIL

Dear Anna, please stop the development of the 2 skyscrapers adjacent to Bevis Marks. This historic gem will be crushed between these two monstrosities. They will block light and the skyline and turn this beautiful heritage space in London into an ugly, disjointed eye sore. It's downright disrespectful to even table such plans.
Many thanks
Naomi

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objections to Granting Planning Permission at 31 Bury St
Date:	16 May 2024 15:50:52
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Bill Benjamin [redacted]
Sent: Friday, May 10, 2024 7:14 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objections to Granting Planning Permission at 31 Bury St

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

Any one who works or visits the City of London is impressed with the wonderful mix of the old and the new. Bold, newly designed office towers standing next to smaller yet equally noteworthy Wren churches, reminders of an age not entirely obsessed with this worldly concerns.

It is therefore will great concern that I write to object to the construction of a proposed office tower on Bury Street which will forever darken Bevis Marks, the oldest synagogue in London. If approved, the tower will obscure for worshippers and visitors views of the sky.

Of course, London needs to grow upwards to accommodate its labour and commerce but I am sure there are ways to do so without ruining this beautiful synagogue, still in daily use, and a reminder of Anglo Jewry's four hundred year presence in our country and its significant contribution.

Thank you for consideration of this matter.

Yours, sincerely,

William Benjamin
London NW3 5QE
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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application reference: 24/00021/FULEIA.
Date:	16 May 2024 15:51:51
Attachments:	image002.png

Hi all,

Please see below objection re 24/00021/FULEIA that needs to be registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Michael Ross [redacted]
Sent: Friday, May 10, 2024 7:11 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

It is with great consternation that I pen this missive, denouncing in the staunchest terms the egregious endeavor encapsulated within application 24/00021/FULEIA. As a stalwart member of the esteemed Bevis Marks' Spanish & Portuguese Jewish community, I find myself aghast at the audacity of this renewed proposal, particularly in light of its previous rebuff and the recent enshrinement of the Creechurch Conservation Area.

This resubmitted application, bearing scant alteration from its antecedent iteration, flagrantly disregards the imperative tenets of preservation, as behooves a Grade-1 listed edifice, now encompassed within a sanctified conservation locale and holding the mantle of paramount

importance as the quintessential Jewish bastion in the United Kingdom. The looming tower, proposed for erection in close proximity to the venerable synagogue's southern precincts, threatens to subjugate its august ambiance, obscuring the celestial vista revered by the faithful and casting a pall over the hallowed grounds, thereby attenuating their luminal sanctity.

Such an affront to the architectural and spiritual integrity of this revered institution would be unimaginable in the environs of St. Paul’s Cathedral and should unequivocally be deemed intolerable in the immediate vicinity of the oldest continally used synagogue in Europe, the epicenter of British Jewry. I implore you in the strongest terms to rebuff this application forthwith, lest we allow the sacrilege of our heritage and the desecration of our sacred spaces to proceed unchallenged.

Yours faithfully,

Michael Ross

Begum, Shupi

From: Alexandra Jackson [redacted]
Sent: 16 May 2024 20:28
To: lpaburystreet
Subject: Re: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

187 Camberwell Grove
London SE5 8JU

On 13 May 2024, at 13:09, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Alexandra Jackson,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

<image003.gif><image004.jpg>

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Alexandra Jackson [redacted]
Sent: Wednesday, May 1, 2024 6:52 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

As a listed building and also the place of worship for my family (Saqui) for several generations, I'm horrified that the overdevelopment of this site is being reconsidered. St Paul's post dates this synagogue and development of this type right there would never be considered. Don't be pressured by commercial concerns and rejects this development. A more appropriate site should be found or none at all. Once permission is given you've lost important heritage for ever . Don't allow this and respect this country's past.

Alexandra Jackson
Sent from my iPhone
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Zoë Garbett
City Hall
Kamal Chunchie Way
London E16 1ZE



Anna Tastsoglou
The Department of the Built Environment
City of London
P.O. Box 270, Guildhall
London EC2P 2EJ

Sent via email to: anna.tastsoglou@cityoflondon.gov.uk

23 May 2024

Dear Anna,

Re: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR, Planning Ref. 24/00021/FULEIA

I have been contacted by constituents from the Jewish community in London about this planning application and its potential impact on the Bevis Marks synagogue. Please accept my apologies for sending this letter after the deadline for comments – I was newly elected to my role as an Assembly Member just three weeks ago.

The sole synagogue in the City of London and the oldest in the country, Bevis Marks synagogue has a totemic significance for Jewish people living locally, across London and in the rest of the UK. As one constituent in the neighbouring borough of Islington told me: "as an Islington Jew I sometimes attend myself but in any case have an emotional attachment due to its place in the community's history." Preserving the character of the synagogue is vitally important in making the City of London a truly inclusive place for people of all faiths.

While I appreciate that neither the synagogue or the proposed buildings are in conservation areas, the synagogue itself is a Grade 1 listed building of immense social and cultural value and as such should be protected from harm.

My constituents, however, fear the proposed development will irrevocably impact the character of the synagogue, both during construction and once the development has been completed. These objections have been laid out by concerned residents and groups, as well as by the Protect Bevis Marks campaign.[1]

[1] Protect Bevis Marks, https://protectbevismarks.co.uk/ [accessed 23/05/24]

I urge you to give due regard to the many objections raised and recommend you do not approve this application.

Kind regards,



Zoë Garbett
Green Party Member of the London Assembly

Ms Anna Tastsoglou
Planning & Environment Department
City of London Corporation
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Thursday 23rd May

Applications for Planning Permission (24/00021/FULEIA) and Listed Building Consent (24/00011/LBC)

Dear Ms. Tastsoglou,

We are writing to you on behalf of the Applicant – 'Welput' – on the above applications, regarding a number of non-planning related issues which have been raised during the statutory planning consultation period, which has now closed.

For the avoidance of doubt, the Agent - 'DP9' – will shortly be writing, on behalf of the Applicant, in response to planning issues which have been raised through the City of London's planning portal. In the meantime, we wish to outline our serious concerns – and our response – to the non-planning related matters which have sought to discredit our planning application, the Applicant & developers' reputation, as well as the integrity of the planning system and decision-making process.

The basis of our concerns highlighted below, have either been included within objections to the application or via emails distributed by representatives (including consultants) of Bevis Marks Synagogue (the 'Synagogue'), Trustees of the Synagogue, the Heritage Foundation, or objectors who have submitted comments in response to inaccurate information provided by the Synagogue.

We have observed the series of actions which have been taken as part of a clearly premeditated objection campaign, rolled out from the time of the application being validated, and continuing throughout the statutory consultation period. These have included the following:

1.Employment or appointment of consultants who employee elected members of the City of London Corporation

The Applicant, the Developer or the WELPUT fund has not appointed or employed any consultant who has elected members of the City of London Corporation on their professional team. Specifically, and to clarify, JBP has had no involvement with this Site or project, as is suggested in a public objection letter submitted by Sir Michael Bear (appended to this letter). We have now been contacted by a number of journalists who have received a copy of this letter of objection, and we have confirmed to these journalists that the statement is incorrect and that we would be pleased to be quoted to set the record straight.

The objections have suggested that, as a result of the fabricated statement, we have such consultants, we have influenced or have influence over the planning process in the City of London. This is wholly inaccurate. Furthermore, we would suggest that, without doubt, making these statements has influenced and encouraged objections to our planning application. This is clearly

inappropriate, and we would ask that the City of London treat such objections, based on inaccurate information, accordingly.

We were made aware of the above fabricated story via an email sent from a Synagogue representative a few weeks ago but we assumed that this would not be formally submitted as an objection. However, subsequent actions demonstrate that this is clearly a pre-considered campaign to discredit the Application and Applicant in writing, as well as verbally at presentations. This has resulted in this inaccurate claim being included in the reasons for objection both by the Synagogue representatives and objectors who have submitted comments following the same dialogue with representatives of the Synagogue.

Before making such unfounded allegations, at no point did any representative of the Synagogue contact us via email or telephone to seek to establish whether there was any truth in the allegation.

It is worth noting that throughout the pre-application and planning process, we have engaged with the City of London's planning team and Committee Members in full accordance with the City of London Corporation's adopted Statement of Community Involvement and Developer Engagement Guidance 2023, as well as the National Planning Policy Framework 2023. Such engagement with local representatives is actively encouraged, to help shape the future of planning applications, with regard to planning policy and other considerations.

Throughout our engagement, we have ensured that all meetings with Committee Members have taken place with at least one officer present, to ensure full transparency throughout the process. As part of this commitment to transparency and behaving with integrity, we repeat that we have no consultants on our professional team who employ Members of the City of London Corporation and we remain committed to maintaining transparency about all meetings and interactions that we have with Members and wider employees of the City of London Corporation.

2.Objection campaign and misinformation

Whilst the principle of objecting to any planning application (or listed building consent application) is due process within the statutory period after an application has been validated, we would ask how objections can be considered as valid when the objection campaign has purposely issued misinformation; namely details from a different planning application, or information that has not been included within the actual application and is purposely inaccurate and misleading. In addition to this, there are large number of objections that have repeated the exact words issued as part of the objection campaign – directly quoting such inaccurate and misleading information.

- A 'Call to Arms' pdf issued by Bevis Marks Synagogue via email (appended to this letter), which included images of the previous planning application and a photo of the Synagogue that was taken over 4 years ago and does not reflect its current setting (including the now largely complete 40 Leadenhall Street building).
- A 'Call to Arms' pdf updated to 'Protect Bevis Marks Synagogue' included within further emails including incorrect information that does not form the planning application and then uploaded to a website (www.protectbevismarks.co.uk) which remains live today and accessible by the City of London.
- This information was further distributed in April to the "Friends of the Bevis Marks Synagogue Heritage Foundation" under the title "Call to Action: protect Bevis Marks Synagogue". We made

contact with the heritage foundation to highlight the inaccuracies and misrepresentation in the email and offered to meet to discuss this further. No response has been received to date.

- There is now a third iteration, that includes an image, suggesting that it is our application, which is inaccurate and does not represent the massing proposed in our application. However, it does show the implemented 100 Leadenhall Planning application in yellow, which was not objected to by the Synagogue during its recent Planning process.
- None of the images show the recent planning approvals visible from the Synagogue courtyard (that have not had sustained objections from the Synagogue), nor do they show the significant and very relevant changes made to the courtyard since the last 'Bury House' planning application – including a new ramp access to the museum, a new security booth at the entrance and a ticket booth in the courtyard. This is in addition to the new museum design wrapping around the southern side of the Synagogue (and not shown in the images).
- The above-mentioned documents include clearly contradictory (and inaccurate) references to the number of storeys proposed as part of the new application (and compared to the refused application). These height references are copied (without understanding or verification) in a number of objections. To clarify, the proposed tower element of the building is ground plus 43 storeys.

Whilst comments included within these above documents in relation to Daylight / Sunlight / Overshadowing will be covered by the response on planning matters, being prepared by DP9 and GIA, the Synagogue representatives continue to imply through their objections that it is "not feasible" to install new lighting "Because of the historic nature of the synagogue", and that our proposed development will result in the Synagogue being "...plunged into darkness".

Contrary to the above statements, as part of the objection campaign, the Synagogue's May 2024 newsletter (appended to this letter) refers to the installation of new artificial lighting, suggesting firstly that lighting conditions are an existing, operational issue / problem; and secondly that it is in fact possible to install new lighting (with or without securing permission for this type of work in a listed building).

It should be noted that during pre-application discussions with the Synagogue representatives, we jointly reviewed the existing condition of the internal lighting with a specialist lighting consultant who has worked within many religious and listed buildings. The City of London and Historic England were in attendance and it was agreed that an artificial light solution is required today. An outline report was offered to be commissioned (and paid for) by the Applicant, but not taken up by the Synagogue.

The above series of factual inaccuracies, misleading statements and out-of-date information - circulated through these, and other, channels - are subsequently reflected in many (if not the vast majority) of the letters of objection. This is clearly inappropriate, and we would ask that the City of London to treat such objections, based on inaccurate information, accordingly.

3. Targeting application supporters

We have been made aware that a new pdf has been developed titled 'Letter to Friends' (appended to this letter), which the Synagogue's representatives have sent directly to numerous community groups, charities, educational establishments and individuals who have publicly voiced their support for our proposals, urging them to re-consider and rescind their support for our planning application

based upon some of the same inaccurate or misleading information outlined above, particularly regarding the inaccurate information about the proposals' impact upon Bevis Marks Synagogue.

We have also been made aware that representatives of the Synagogue have also followed up with telephone calls to such individuals or groups that have submitted letters of support for the application.

Support for the proposed community spaces within Holland House and Creechurch Hall has largely come from charities, community groups and educational establishments across London and the UK, who have expressed an urgent need for more affordable and accessible spaces in the City of London, and who see our application as filling an urgent gap and meeting this need in the long-term.

Each letter is clearly individually written, explaining their thoughts on the benefit of the Cultural Strategy included as part of the planning application and it is incredulous that an objector to our application would seek to contact those supporters with misleading information, in fact with any information, to ultimately seek to persuade them into withdrawing their support. This is wholly inappropriate and puts the integrity of the entire planning process in jeopardy.

It is well known that members of the public or organisations often hold reservations about formally sharing their support for proposed developments due to concerns about the potential targeting by opponents, and such activities, targeting misinformation at supporters, underlines this point.

The individual letters of support promote the benefits of the Applicant's Cultural Strategy, which re-enforces the requirement to respond to the Destination City Policy through the delivery of a multi-functional space in the heart of the City. The majority of supporters have used the existing office space for various activities that provides actual test cases to confirm the need and the community benefits proposed to be brought forward through the Application. Even without any letters of support, the Cultural Strategy of the Application is the most tested benefits package included in any application to the City of London.

4. Dialogue with the Synagogue

Over the past 5+ years, we have continuously sought to engage with the Bevis Marks Synagogue as our direct neighbour. Our efforts continued following our previous, unsuccessful planning application and at the time of submission of this planning application, the Applicant has met or held discussions with Trustees and representatives of the Synagogue at least 13 times. Whilst dialogue and conversations with wider representatives of the Synagogue, were particularly constructive after the refusal, during the past year, the Synagogue has provided no recent meaningful response to our attempts to engage with them. To clarify, and addressing comments made by the Synagogue in various press releases, that at no point does our application (specifically the Statement of Community Involvement) infer that we have addressed the Synagogue's concerns and / or gained their support to the applications.

Most recently the Applicant advised the Synagogue Trustees that a new application had been submitted and also confirmed that it was validated in writing. We offered to meet to discuss the application or print copies for the Trustees. We have still not received a response.

Our respective planning advisors recently met without representatives of the Applicant or Objector, which re-confirmed that the Synagogue will be formally issuing their objections to the planning application, which once received we will review and respond, through DP9.

5. Social media

Whilst we, as the Applicant, have chosen not to use social media (Twitter or X / YouTube/ Instagram / etc.) to promote the applications during the statutory consultation, the objection campaign has extensively used this range of media outlets which has provided the opportunity for the Applicant to review and record all statements and messages that have generated objections. We have also reviewed all the historical statements and videos made and released on these platforms which are not part of the objection campaign that provide differing (and clearly contradictory) views than those included in the reasons for objections distributed. We will include this information in a further letter responding to the non-planning objections

Conclusion

We urge you to consider these observations in response to non-planning matters which have been raised as objections to our application and seriously consider those objections generated as a result of the above actions, accordingly.

Yours sincerely,

[redacted]

Alexander Morris
Development Director
BGO

Attachments referenced in the letter dated on May 23, 2024, to Anna Tastsoglou.

To: City of London Planning Department 11th May 2024

P.O. Box 270, Guildhall, London, EC2P 2EJ.

Email: anna.tastsoglou@cityoflondon.gov.uk

Dear Anna,

Re: Planning Application Reference: 24/00021/FULEIA.

I have delayed my response to this Planning Application as it is so inappropriate and in such conflict with its surroundings that I was hoping that the applicant would see sense and withdraw this ridiculous application. Disappointingly as this is not the case, I would firstly draw your attention to the fact that this application is no better in its negative impact than the last application by this applicant, refused only two years ago by the City. The reasons for that refusal are abundantly clear and just as relevant to this current application.

Consequently, I write to object in the strongest terms to the application for the proposed redevelopment of 31 Bury Street ("the Scheme"). The construction of a 45-storey tower on this site will cause wholly unacceptable "substantial" harm to the neighbouring Grade I listed Bevis Marks Synagogue and the Creechurch Conservation Area within which both the Synagogue and the application site now sit..

The main points of my objection and opposition to the Scheme are as follows:

The proposed 45-storey tower on this site would result in substantial harm both to the setting of the Grade I listed Synagogue and to the wider Creechurch Conservation Area. This tall office tower, so close to the synagogue, would both block the sky view and overshadow the Synagogue and its courtyard. The sky view is of great importance for reasons of religious ritual. Adequate daylight and sunlight are vital to enable the building (which largely relies on natural light and candles) to function as a place of worship; and to enable both the building and its courtyard to continue to support the many community activities which have been ongoing for over three centuries. This is totally unacceptable.

The Scheme is in direct conflict with the Statutory Development Plan. The application site is within the recently created Creechurch Conservation Area. Local Plan Policy CS14 provides that planning permission for tall buildings should be refused within inappropriate areas, which specifically includes Conservation Areas. The benefits claimed by the Developer for what is an ordinary office redevelopment, do not begin to outweigh the fundamental conflict with the Development Plan.

As noted above, the City rejected a very similar scheme at 31 Bury Street only two years ago. The Scheme makes only a modest reduction in height to 45 storeys and has a larger footprint than the previous scheme which was rejected. On a point of principle, the City must show consistency in its decision-making by refusing this latest scheme. The principle and desirability of consistency in planning decision-making is well established, and the City should always set an example in such matters.

To add weight to this point, since the previous Bury Street application was refused, the City has adopted the Creechurch Conservation Area. That decision, supported by the Conservation Area Appraisal, reflected the uniqueness of the Synagogue and purported to protect it and its setting. The City specifically decided that the boundary of the Conservation Area should include the Bury Street site and recognised the importance of the Synagogue's wider setting. This point was accepted by the Chairman of Planning in answer to a question from Alderman Jones at the Court of Common Council on Thursday 7th March 2024.

To approve this Scheme, in conflict with the Development Plan and these previous decisions, would be inconsistent and undermine confidence in the planning process.

With regard to its Public Sector Equality Duty, the City must consider the disproportionate negative impact this Scheme would have on 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. This point is reinforced by the strength of objections received so far.

In conclusion, to approve this scheme would be an act of vandalism and heathenism, seemingly reflecting a lack of historical, cultural and religious understanding by the Corporation, and its failure to appreciate the significance of the Synagogue as the oldest and most important Sephardi Jewish Synagogue within the UK, as well as the most important Anglo-Jewish site within the UK, which has been in continuous use as a place of worship for over 300 years.

The Jewish Community has been forced to fight repeated planning battles through no fault of its own. If the City wishes to uphold its legal duties and stand by its Jewish community it will reject the proposal.

It is a matter of outrage that the Chair of Policy, the "Political Leader" of the City, has recently declared a pecuniary interest in this development as a Director of JBP, a public affairs and lobbying company, employed on this project by the Developer. Although the Policy Chair does not sit on the Planning and Transportation Committee, he is highly influential within the Corporation, chairs the Policy and Resources Committee and is a member of the Local Plans Sub-Committee. These oversaw both the creation of the Conservation Area (which was originally intended to exclude the 31 Bury Street site, until there was overwhelming consultee rejection of that approach) and draft new City Plan (which seeks to undermine the importance of Bevis Marks as a historic place of worship, by limiting its protection only to an artificially concocted "immediate setting" - a term which is not recognised in Conservation and Planning Law - and by removing the general presumption against tall buildings in Conservation Areas).

The Corporation's international reputation hinges upon it behaving with the utmost probity, and holding itself to the highest standards. What is happening here is in danger of seriously undermining that reputation.

Yours sincerely

Sir Michael Bear

Former Lord Mayor of the City of London

!7 Cyprus Gardens

LONDON N3 1SP

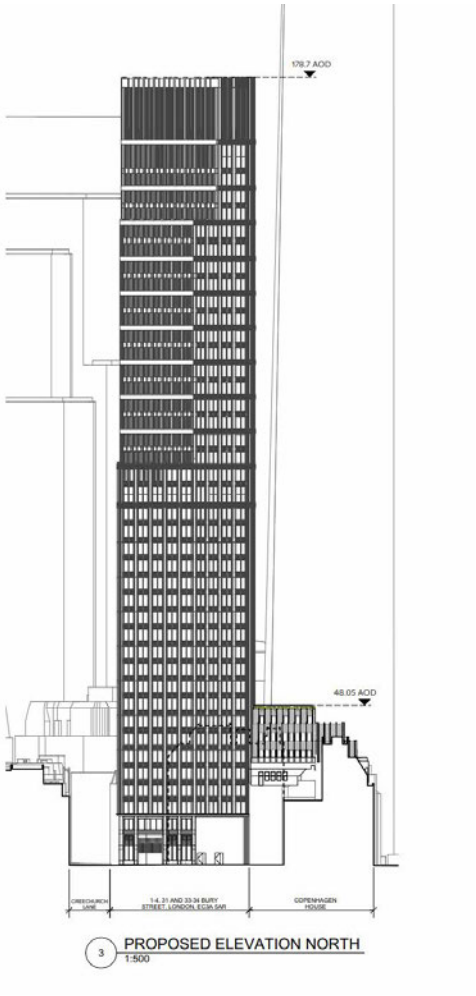
Email [redacted]

Mobile: [redacted]

THE NEW THREAT TO BEVIS MARKS SYNAGOGUE
A CALL FOR WIDESPREAD OBJECTION

Bevis Marks Synagogue is the oldest continuously used synagogue in Britain, dating from 1701. It has enormous cultural significance, being in effect the cathedral church of Judaism.

It is located in the City of London, where it has over the years suffered tall buildings being erected around it. However, the very important southern sky view remains unobstructed, enabling the moon and the stars to be viewed from the courtyard.



In 2020, a 48 storey office building was proposed just 25 metres away at 31 Bury Street. After a worldwide campaign which generated more objections that the City Corporation has ever experienced before, the Corporation refused permission in 2022, primarily because of the unacceptable impact on the synagogue.

The developers are audaciously trying again, with a building that is to all intents and purposes the same.

Tireless work by the Synagogue community has led to the area now being designated as a Conservation Area. However, the City Corporation has given with one hand and is taking away with the other - it is proposing to scrap the ban on tall buildings in Conservation Areas and indications are that the leadership is now supportive of the proposed building.

We therefore need even more people to join the campaign to defeat this latest attempt.

=====

WHAT YOU CAN DO

Please go on the City Corporation's website: https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?keyVal=S6YBENFHH1E00&activeTab=summary
Click on "Make a Comment" and say what you wish to say.

Alternatively you could write to the case officer, Anna Tastsoglou, either at anna.tastsoglou@cityoflondon.gov.uk or at P.O. Box 270, Guildhall, London, EC2P 2EJ.

Please quote the planning application reference: 24/00021/FULEIA.

=====

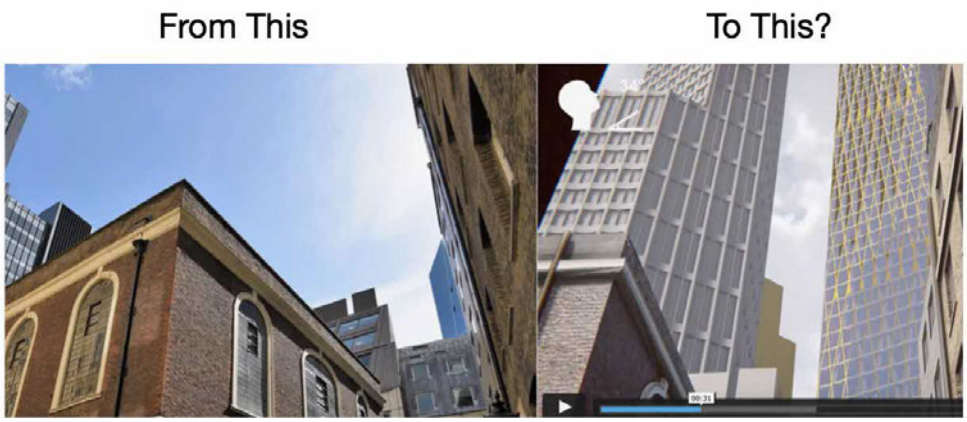
POINTS YOU MAY WISH TO MAKE

It is important you use your own words, but things you might like to comment on are these:

- A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.

It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?
It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.
The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place.
It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations.
It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.
The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.
The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025.
The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to close scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.
They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism.
The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.
The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.
The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority.

If possible, it would be very helpful if you would copy your response to us (or at least tell us you have made one), so we can keep track. This can be done by emailing Rabbi Morris at rabbimorris@sephardi.org.uk or posting material to him at Bevis Marks Synagogue, London, EC3A 7LH.Your support will be very much welcomed.



[1] There is a separate Listed Building consent application for Holland House: 24/00011/LBC

Subject: Bevis Marks Synagogue Heritage Foundation retains Royal Patronage by His Majesty King Charles III

From: "Bevis M (office@bevismarksheritage.org.uk)" <office@bevismarksheritage.org.uk>
Date: 15 May 2024 at 15:44:37 BST
To:
Subject: Bevis Marks Synagogue Heritage Foundation retains Royal Patronage by His Majesty King Charles III
Reply-To: Bevis M <office@bevismarksheritage.org.uk>

Bevis Marks Synagogue Heritage Foundation Update

Dear Friends,

We are delighted to share the news that His Majesty King Charles III has confirmed he will be retaining the Patronage of The Bevis Marks Synagogue Heritage Foundation.

The news was confirmed following a thorough analysis of over one thousand organisations and to mark the first anniversary of Their Majesties' Coronation.

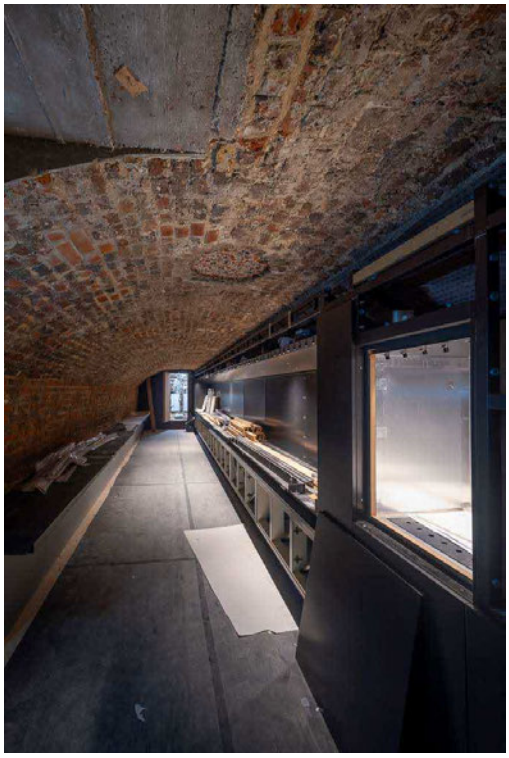
Melody Salem, Chair of Bevis Marks Synagogue Heritage Foundation commented:
"This is a remarkable honour and a testament to the significance of the work of Bevis Marks Synagogue Heritage Foundation. I would like to thank our staff, volunteers and supporters - past and present - for their ongoing hard work and commitment which has been instrumental in reaching this milestone."

In other news...

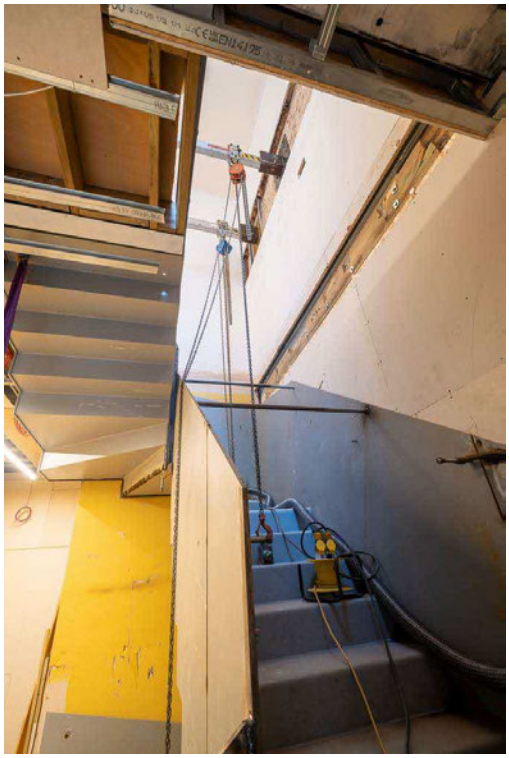
Today (15 May) is the last date to submit your objection to the proposed development of a 45-storey tower at 31 Bury Street. The proposal fails to respect the immense heritage of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre. If you haven't already done so, you can submit your response to the application by following this link

Work on site continues as we prepare to open the Dangoor Visitor and Education Centre to visitors later this year. Please see below for a few images.

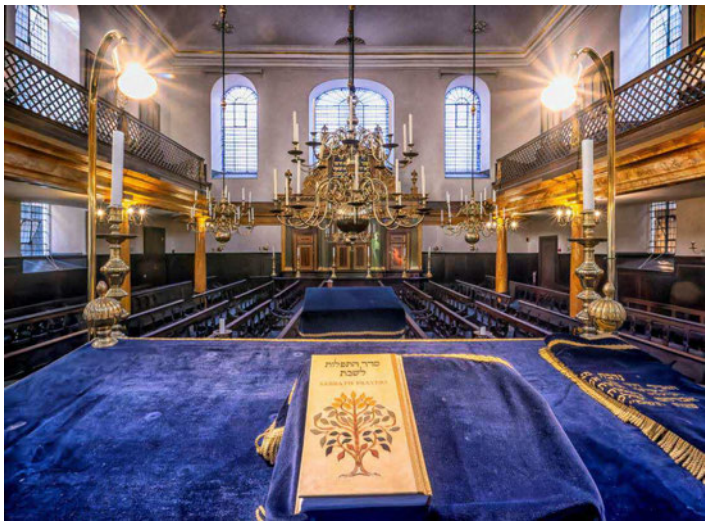
Below: Glass showcases ready to be installed in the George Weisz Treasury



Below: the staircase has been installed to take visitors down to the basement area



Below: new lighting has been installed on the Tebah



Also supported by The Weisz Foundation

Bevis Marks Synagogue Heritage Foundation, **119-121 Brent Street, London NW4 2DX**
Registered charity number 1184803

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To our friends in the community,

I am writing on behalf of Bevis Marks Synagogue and in relation to Welput's proposed development at 31 Bury Street, EC3A 5AR (link here).

We understand that you have been offered space in the application's proposed community hub building. In light of this, we gently write to inform you that despite Welput's offering of cultural space and community benefit, the proposal has an overwhelming negative impact on its neighbour, Bevis Marks Synagogue, as well as wider culture and heritage setting in the City core.

Detriment on historic landmarks

Welput's proposed building on Bury Street is directly adjacent to the synagogue, which is the oldest synagogue in continuing use in Europe, and a Grade I listed building. It is home to a living congregation and is critical historical site for British Jewry. Grade I listed buildings St. Botolph's Church and St Katharine Cree are also in the close vicinity, as are many other unlisted buildings. This is such an important cluster of heritage sites that the City of London has newly awarded Bevis Marks and its surrounds as a national Conservation Area.

Professor's blog on Bevis Marks's historical importance.

31 Bury's effect on Bevis Marks

Welput has suggested not only a restoration of Holland House and adjacent buildings, but a 45-storey office block, which severely threatens Bevis Marks' historical position within the city of London and its current use as a living cultural centre.

The proposed tower blocks incoming light to the synagogue's windows. Our building is a 300 year-old cathedral-type building, and without adequate light, our ability to hold key Jewish rituals is severely compromised.

The building's courtyard is also important to Bevis Marks' history and current use. The courtyard was built in 1699 and since has hosted generations of religious events, from weddings to festivals and community assemblies. Welput's tower would directly block the courtyard's remaining views to the sky, which is especially important to Jewish rituals.



VuCity rendering of proposed 31 Bury Street (red) beside Bevis Marks (green)

We have continued to unsuccessfully negotiate with Welput for over 5 years to adequately account for this impact on Bevis Marks and the surround heritage buildings.

Short clip on the impact of the proposed building

31 Bury – recent planning rejections

As you may know, Welput's 2020 application on the same site was rejected, and the City of London councillors expressed their concern for the substantial harm to heritage sites including Bevis Marks and The Tower of London. Despite this, Welput's current application remains largely the same. The current application is a mere 4 storeys lower at 43 blocks. From our position, light and setting impact is still extremely adverse.



Sky views - courtyard at Bevis Marks

Welput claims to bring great benefit by offering of community spaces, but we contend that this should be a requirement of all new buildings in the city and not a token to trade for a towering 45 storey tower. Restoring Holland House should not be at the cost of substantially harming neighbouring heritage sites including Bevis Marks, Tower of London, St. Katharine's Cree and St Botolph's Church.

Heritage organisations, including Historic England, SAVE Britain's Heritage and Museum of London Archaeological Society outspokenly object to Welput's application, as do our faith neighbours.

Read St. Katharine's Cree article of opposition.

Indeed, the objections are widespread and The City of London planning site logs more than 750 community objections and counting.

Your organisation and others should be offered great spaces to connect with the community London, and subsidies to hold great programmes regardless of developers' underlying objective to build tall. The community spaces that Welput have offered you should not be used as brownie points to dangle in front of the City of London to appease the city's concerns

BBC article summarising local dissent

Our request from you

Considering this, we hope to ask for your help. We greatly appreciate the need for cultural spaces in London, but this should not come at the expense of the existing heritage culture in the area.

We urge you to re-consider the effect of Welput's application and ask if you would rescind your support for the application. We would greatly appreciate if you would make a comment in support of a reduced height building at 31 Bury Street.

Where to make a comment: application portal

We greatly appreciate in advance your consideration.

Sincerely,

Rabbi Shalom Morris
Bevis Marks Synagogue

31 BURY STREET
Fallback template letter to City Corporation

Please note it is much better if you object in your own words, but we realise you may not have time to do this. Hence you might wish to use the text below, preferably with some adjustment so it isn't just a "standard product".

===

I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

===

HOW TO SUBMIT YOUR VIEWS:

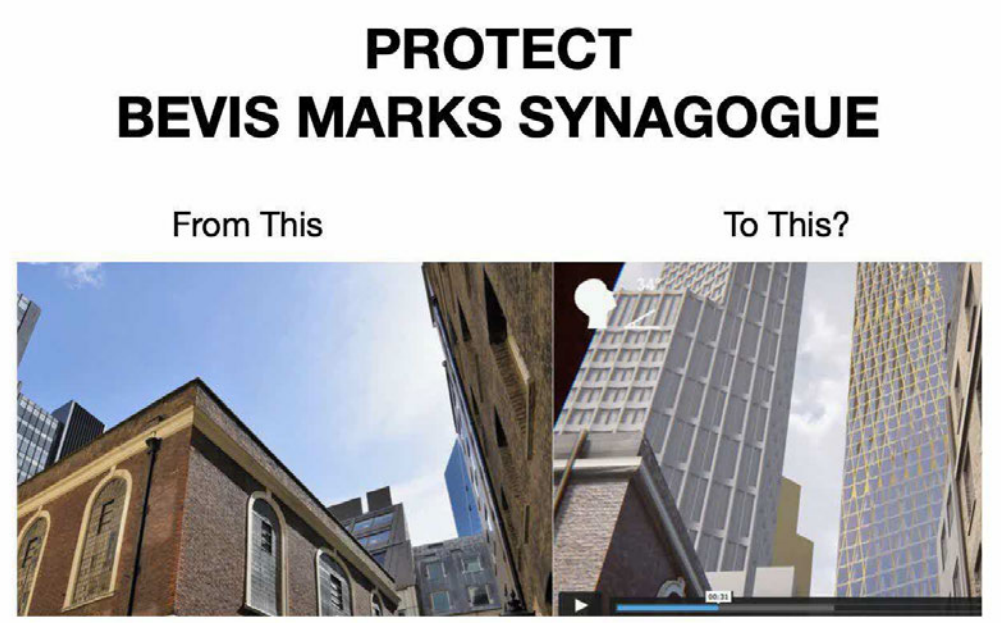
Please go on the City Corporation's website:

LINK

Click on "Make a Comment" and say what you wish to say.

Alternatively you could write to the case officer, Anna Tastsoglou, either at anna.tastsoglou@cityoflondon.gov.uk or at P.O. Box 270, Guildhall, London, EC2P 2EJ.

From: "Bevis Marks Synagogue Heritage Foundation (office@bevismarksheritage.org.uk)" <office@bevismarksheritage.org.uk>
Date: 16 April 2024 at 17:40:15 BST
To:
Subject: Call to Action: Protect Bevis Marks
Reply-To: Bevis Marks Synagogue Heritage Foundation <office@bevismarksheritage.org.uk>



Dear Friends,

I am once again sending a call to action for you to help us protect Bevis Marks Synagogue.

Despite our successfully achieving a Conservation Area around Bevis Marks Synagogue just a few months ago, the City of London has now undermined our efforts and changed the goalposts which previously barred tall buildings in these protected areas.

As a result, developers at 31 Bury St have now submitted a new application for a 45 storey tower, a negligible change from the 48 storey tower that was refused just two years ago. It fails to respect the immense heritage of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre.

We therefore need to you to strongly object, and to do so without delay. We encourage you to use your own words and views, but provide you with a sample template below. You can also read this document for additional points.

To submit your objection please follow this link.

Thank you,



Melody Salem
Chair, Bevis Marks Synagogue Heritage Foundation

Sample Letter of Objection:

I'm writing to express my strong opposition to this new application (24/00021/FULEIA).

I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.

This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year.

The new tower, to the synagogue's immediate south, would dominate the

protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.

What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years?

This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.

I urge you to refuse this application.



Also supported by The Weisz Foundation

Bevis Marks Synagogue Heritage Foundation, **119-121 Brent Street, London NW4 2DX**
Registered charity number 1184803

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From:	Ipaburystreet
To:	Zdunik, Rafal
Subject:	FW: 24/00021/FULEIA
Date:	01 July 2024 10:56:00

From: Laura Jacobus [redacted]
Sent: Monday, May 6, 2024 12:41 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

re: application 24/00021/FULEIA

I was extremely concerned to hear of the revived proposal to build this massively tall building in a sensitive location. As an architectural historian and as a Jew I am appalled that such a completely unnecessary development can even be under consideration in a conservation area which is of national significance. The proximity of Britain's oldest synagogue is of major concern, not only because of the inevitable disruption to its religious use, but also because of the potential structural damage to the building's foundations that could ensue.

Yours sincerely,

Dr. L. Jacobus

From:	Tastsoglou, Anna
To:	lpaburystreet
Cc:	Zdunik, Rafal; Begum, Shupi
Subject:	FW: Bevis Marks Planned Building
Date:	03 June 2024 16:39:36
Attachments:	image002.png

Hi,

Can you please deal with the following request to change the 'support' to 'objection' please?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Geoffrey Ben-Nathan [redacted]
Sent: Wednesday, May 22, 2024 11:56 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Barry Musikant [redacted] Michael Keats [redacted]
Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>; [redacted]
Subject: Bevis Marks Planned Building

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastoglu,

My colleagues have prevailed upon me to ask you formally to convert my 'support' for the proposed building planned to be adjacent to Bevis Marks Synagogue into an objection.

Could you please, if you can, do so?

They believe that despite my extreme sarcasm (proposed building would be a barbarian monstrosity etc.), the tick in the support box overrides the attendant comment.

The support was conditional upon the Council supporting a similar structure adjacent to St. Paul's.

I believe I 'supported' the previous proposal on exactly the same basis. That 'support' was successful. The Council threw out the proposal definitively. I hope, and believe, they will do the same again.

Yours Sincerely,
G.M. BEN-NATHAN (Mr).

From:	Tastsoglou, Anna
To:	Horkan, David; lpaburystreet
Subject:	FW: Notes on shortcomings within Radiance Assessment dated January 2024 for redevelopment at 1-4, 31 and 33-34 Bury Street, London EC3A 5AR, planning app no. 24/00021/FULEIA
Date:	03 June 2024 16:32:52

Hi,

I received the following anonymous email. I assume it can be uploaded on the website. @Horkan, David – do you agree with that?

Thanks,

Anna

From: Messiah is Judaism [redacted]
Sent: Thursday, May 23, 2024 12:04 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Notes on shortcomings within Radiance Assessment dated January 2024 for redevelopment at 1-4, 31 and 33-34 Bury Street, London EC3A 5AR, planning app no. 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

To Ms Tastsoglou,
City of London Case Officer for planning application 24/00021/FULEIA

I write anonymously as someone who works in planning advisory, this being a niche business, I do not wish to disclose my details formally.

Having reviewed the Radiance Assessment submitted with planing application 24/00021/FULEIA, I have found several shortcomings, which I lay out below.

1. Page 14 titled 'BS EN 17037:2018 and the UK Annex' lays out the relevant BRE (Building Research Establishment) guidance to which the said application is subject. It describes the Illuminance method as using 'sky and sun conditions derived from standard meteorological data', and taking into account 'location and building orientation'. The Radiance Assessment goes onto to neglect this method in favour of the Daylight Factor method, described on page 15 as 'considering an overcast sky and therefore the orientation and geographical location of the buildings [analysed] is not relevant'. Though the BRE guidance states either test may be used, it seems the Illuminance test would be more useful in a case such as this where orientation is paramount.

2. Pages 15-16 also under 'BS EN 17037:2018 and the UK Annex' neglect to mention at all the APSH (Annual Probable Sunlight Hours) test, which remains the key assessment for sunlight access to Existing Buildings as per paragraph 3.2.13 of the nationally accepted BRE's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (the BRE Report). The risk to Bevis Marks Synagogue in pages 4-5 of the Independent Review of the Daylight and Sunlight Report commissioned for previous planning application 20/00848/FULEIA, was flagged as 'Moderate

Adverse' in the Proposed scenario and 'Major Adverse' in the Cumulative scenarios and it is surprising that this test is omitted from the latest planning application.

3. Page 22 of the Radiance Assessment assumes a visible light transmittance of 80% for the main glass panes of the Synagogue windows (going by paragraph C26 of the BRE Report this would make the manufacturers' normal incidence light transmittance 88%). Page 24 however has an oblique photo of the Synagogue windows taken from an external rooftop where they look dulled or aged, placing an effective 80% visible light transmittance into question.

I hope my observations have been useful and again I apologise for the understandable request of my anonymity.

Yours Sincerely,
Anon

[redacted]
Shield House
Harmony Way
London, NW4 2BZ
www.thejlc.org
@jlc_uk
@jlc.uk
JewishLeadershipCouncil

[redacted]

The Rt Hon Lord Mayor
Alderman Professor Michael Raymond Mainelli
By email: [redacted]

16th May 2024

Re: Planning Application: 24/00021/FULEIA

My Lord Mayor,

I am writing to you as a result of the planning application at 31 Bury Street for a 43-storey office building, adjacent to the internationally renowned Bevis Marks Synagogue. This will cause substantial harm to the synagogue community.

Constructed in 1701, Bevis Marks was the first sizable synagogue in England, following the resettlement of the Jews in England in 1656. The Jewish community has become a valued part of British life in the years since it's construction. It is the oldest synagogue in Europe to hold continuous services and considered the Cathedral Synagogue amongst British Jewry.

I had understood that the recent instigation of the Creechurch Conservation Area would protect the synagogue's views. This now appears to not be the case and we would request that the proposed New Local Plan for 2040 be amended so that the existing presumption that tall building will be refused permission in conservation areas is retained.

I understand that an almost identical proposal at 31 bury St was turned down at planning committee two years ago and the current proposal does not address the grounds on which it was refused. So it is with great sadness that I am writing to you to object to the latest proposed scheme. It will greatly affect the light that enters the synagogue and, along with the cumulative effect of this and other previously built developments, will disrupt prayers and the use of the courtyard. The substantial harm caused by this development to the setting of the synagogue will greatly affect its continued use and cause great harm to the Bevis Marks Synagogue community.

Please can you pass this letter on to the relevant persons and ensure that our objection is noted.

JLC is a charitable company which operates in furtherance of its charitable purposes only. Charity registration No: 1115343.
The Jewish Leadership Council is a company limited by guarantee. Registered in England and Wales No: 5742840.

Yours sincerely,



Keith Black
Chair, Jewish Leadership Council

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The Jewish Leadership Council is a company limited by guarantee. Registered in England and Wales No: 5742840.

BOARD OF DEPUTIES OF BRITISH JEWS
ADVOCACY | DEMOCRACY | COMMUNITY

The Rt Hon. The Lord Mayor, Alderman Professor Michael Mainelli
Members' Room
P O Box 270
Guildhall
London
EC2P 2EJ

Dear Lord Mayor,

24/00021/FULEIA and 24/00011/LBC

I am writing to you, as I was forced to write to your predecessor in 2021, to object formally to this planning application which, if approved, would have a detrimental impact on the Jewish community's beloved Bevis Marks synagogue, the oldest continuously used synagogue in Britain which dates from 1701. This most recent planning application is no less harmful than the earlier one which thankfully was rejected, following widespread opposition.

I write as President of the Board of Deputies of British Jews aware that my organisation, founded in 1760 to represent the Jewish community throughout the country, emerged from those Jews of Spanish and Portuguese heritage such as the founders of the Bevis Marks Synagogue. Modern British Jewish history was born at Bevis Marks when Jews first returned to this country following our expulsion in the 13th Century. It offered a safe haven to those who came from overseas and that feeling very much remains to this day. The synagogue is also the legacy of those who came before me in leading the community, and whenever I am at Bevis Marks I am humbled by that fact.

At 45 storeys, the proposed building would destroy the southern sky view, which is an essential part of the setting of the synagogue and is important for the intangible qualities it contributes to our religious ritual. Not only will it shroud the building in shadow, but it will have a direct impact on the local communities weekly Sabbath rituals. In Judaism, it is essential that we judge the coming of the Sabbath, and the end of the Sabbath, by our view of the night sky and the visibility of the stars. Should this development go ahead, the view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. Lastly, the synagogue, which is a Grade 1 Listed building will lose its character and significant beauty as a result of the proposed development.

ORT House, 147 Arlington Road
London NW1 7ET
info@bod.org.uk
www.bod.org.uk
+44 20 7543 5400
@boardofdeputies

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To add further insult to injury, the area has recently become the Creechurch Conservation Area, and this proposal flies directly in the face of the principles of conservation.

I would urge you to share with those who will make the relevant decisions, how important the Bevis Marks Synagogue is both to the UK Jewish community, to the City of London, and to the UK as a whole so they can come to the best decision regarding our shared heritage and reject this application.

Yours sincerely,



Marie van der Zyl OBE
President

ORT House, 147 Arlington Road
London NW1 7ET
info@bod.org.uk
www.bod.org.uk
+44 20 7543 5400
@boardofdeputies

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From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: planning application reference: 24/00021/FULEIA.
Date:	04 June 2024 15:04:13
Attachments:	image002.png

Hi all,

Please see below objection re the above application that needs to be uploaded on the website.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Rachel M Johnson [redacted]
Sent: Tuesday, June 4, 2024 3:01 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I'm writing to express my strong opposition to this new application (24/00021/FULEIA).

As a British Jew I am beyond disappointed at the lack of respect for a Jewish place of worship. There have been enough assaults in the UK on Jews. This new application shows lack of consideration or respect for the essence of a place of worship. This would not be considered if it were Westminster Abbey.

I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

sincerely

Rachel E M Johnson

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks (24/00021/FULEIA)
Date:	04 June 2024 15:48:45
Attachments:	image002.png

Hi all,

Please see below objection re the above application. Please upload online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Peter Gartenberg [redacted]
Sent: Friday, May 17, 2024 9:35 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Bevis Marks (24/00021/FULEIA)

THIS IS AN EXTERNAL EMAIL

I am writing briefly but with strong feeling to object to the above planning application, which I believe is a rehashed but equally potentially damaging version of that which was rejected a few years ago.

Bevis Marks is a hugely iconic synagogue to British Jews (whether or not they belong to the same strand of Judaism) and has a long and proud history, which is one reason that it's

fabric is protected.

The proposal would wreak considerable and unacceptable damage upon its access to light (the possibility of electrical modifications to counter that is limited) and hence to the practicality of meaningful worship and other synagogue activities. It would also dramatically change the character of the immediate area near Bevis Marks (which would affect other heritage assets too). I ask you whether this would be deemed acceptable near an equivalent place of, for instance, Christian or Muslim worship - I think not.

I shall leave it there, as many other people will no doubt be putting forward more eloquent and detailed objections - noting also that both the case for changing the approach to tall buildings seems dubious, especially in this instance, as do the planning 'benefits' cited by the developer.

Please take determined action to scrutinise (and reject) this planning case firmly and fairly in the light of the unique character and importance of Bevis Marks and its locality.

Yours sincerely,
Peter Gartenberg

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objection to 31 Bury Street development
Date:	04 June 2024 15:49:28
Attachments:	image002.png

Hi all,

Another objection to be uploaded on the website.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Daniel Heller [redacted]
Sent: Friday, May 17, 2024 5:45 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>
Subject: Objection to 31 Bury Street development

THIS IS AN EXTERNAL EMAIL

Dear Anna,

I am writing to express my strong opposition to this new application (24/00021/FULEIA). I am dismayed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.

This new application, which has hardly changed since it was most recently submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK.

The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

I look forward to your consideration in this matter.

Best wishes,

Daniel Heller

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Objection to proposed construction of 31 Bury Street
Date:	04 June 2024 16:34:15
Attachments:	image002.png

Hi all,

Please see below objection re the above application. Can this please be uploaded on the planning portal?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: David Salem [redacted]
Sent: Thursday, May 16, 2024 4:39 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Objection to proposed construction of 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Dear Ms

I wish to formally object to the construction of 31 Bury Street

This objection is grounded in the significant negative impact that this development will

have on the historic Bevis Marks Synagogue, a Grade I listed building and the oldest synagogue in the United Kingdom still in use today.

Bevis Marks Synagogue, established in 1701, holds immense historical, cultural, and religious significance. It has served as a continuous place of worship for over 300 years and stands as a testament to the enduring presence and contributions of the Jewish community in London. The proposed construction poses several threats to this invaluable heritage site:

Visual Intrusion and Contextual Disharmony:
The new development, due to its scale and modern design, will overshadow the synagogue, disrupting the visual harmony of the area. Bevis Marks Synagogue is renowned for its architectural integrity and historical ambiance, which would be severely compromised by the juxtaposition of a contemporary high-rise structure. This visual intrusion will detract from the synagogue's aesthetic and historical context, diminishing its presence and significance.
Loss of Natural Light:
One of the most concerning aspects of the proposed construction is the potential reduction of natural light to the synagogue. Bevis Marks relies heavily on natural light to illuminate its interiors, a feature that enhances its spiritual and historical atmosphere. The towering structure at 31 Bury Street will cast shadows over the synagogue, leading to a darker interior that not only alters the experience for worshippers and visitors but also necessitates increased artificial lighting, impacting the authenticity of the historic setting.
Noise and Vibration Disturbances:
The construction phase is likely to introduce significant noise and vibration disturbances. These disturbances can affect the structural integrity of the synagogue, particularly given its age. Vibrations from heavy construction equipment pose a risk to the delicate fabric of the building, which has stood for centuries. Additionally, the noise will disrupt the serene environment essential for worship and reflection within the synagogue.
Increased Traffic and Access Issues:
The development will likely bring increased traffic to the area, complicating access to the synagogue. Bevis Marks is not only a place of worship but also a heritage site frequented by tourists, researchers, and members of the Jewish community. Increased congestion will hinder the accessibility for these groups, impacting the synagogue's function and its role as a community and cultural hub.
Heritage and Community Value:
Bevis Marks Synagogue is not just an architectural landmark but a living institution with deep ties to the local and global Jewish community. Any threat to its well-being is a threat to the community's heritage and history. The proposed development undermines the synagogue's historical environment, which is essential for its continued relevance and function.

In conclusion, the proposed construction at 31 Bury Street represents a significant threat to Bevis Marks Synagogue. It is imperative that the planning authorities consider the

profound and irreversible impact this development will have on one of the nation's most treasured heritage sites.

I urge you to reconsider the approval of this project in light of the substantial harm it poses to Bevis Marks Synagogue, its congregation, and the broader community that values this historic landmark.

Thank you for your attention in this matter

Kind Regards

David Salem
[redacted]

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning Application 24/00021/FULEIA affecting Bevis Marks Synagogue
Date:	05 June 2024 11:55:49
Attachments:	image002.png

Hi all,

Please see below objection re the above application.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Tony Samuel [redacted]
Sent: Wednesday, May 8, 2024 10:58 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning Application 24/00021/FULEIA affecting Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou
I am writing to formally object to the proposed development at 31, Bury Street, EC3A 5AR because of the awful effect this will have on the Grade 1 listed building, Bevis Marks Synagogue, which is less than 200 yards away.
I am Jewish and regularly visit this famous synagogue, the oldest in the UK and the oldest continually functioning synagogue in Europe. I have often accompanied children and young people to visit this historic landmark with its unparalleled cultural history.
It is a most beautiful building and prayer space - an oasis of calm in the heart of the City of

London. It is inconceivable that such a proposed building would be allowed next to St Paul's Cathedral, so why is the synagogue not afforded the same protection?
The proposed building would overshadow the synagogue and its courtyard for much of the day, reducing the usability of the courtyard for rituals and celebrations.
It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship.
The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.
I understand that a previous application for development at 31 Bury Street was rejected some years ago due to the terrible adverse impact that an enormous skyscraper building would have on Bevis Marks Synagogue. This new application would also cause irreparable damage to the sanctity of this sacred space.
A synagogue is not just a building - it is the focal point for a community offering a shared-space for prayer, contemplation and praise. It was built, as many churches are, "for the glory of God" and it should continue to be a sanctuary and place of hope in these very difficult times for the Jewish community in the UK.
Thank you
Yours faithfully
Tony Samuel

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Bevis Marks Synagogue 24/00021/FULEIA
Date:	05 June 2024 11:58:30
Attachments:	image003.png

Hi all,

Please see below objection re the above application to the registered and uploaded online.

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Geoffrey Shaw [redacted]
Sent: Wednesday, May 8, 2024 11:49 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks Synagogue 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am emailing to raise the strongest objection to the proposed tower adjacent to the synagogue. The arguments against the proposal are very well known. The protection of this outstanding synagogue remains of utmost importance and I urge the Council to refuse this application.

Thank you.

Sincerely,

Geoffrey Shaw

The contents of this message and any attachments may be confidential and proprietary.
If you are not an intended recipient, please inform the sender of the transmission error
and delete this message immediately without reading, distributing or copying the contents.

[redacted]

29th May 2024

Dear Sirs,

I've just read in "City Matters" (May 22 – June 18) that Bevis Marks Synagogue is still under threat from a tall office block very close by in spite of an earlier application for a 48 storey tower being rejected by the City Corporation.

The fact that its height has been reduced from 48 to 43 storeys is neither here nor there. Developer Welputs words about maximising heritage and having "a sincere respect for the historic and cultural importance of the area around the site" sound good but essentially these words amount to equivocation. A reduction from 48 to 43 storeys is a gesture by Welput to get their own way and will not fool anyone. I hope the City Corporation will ~~not fall as~~ reject this application and revert to the status quo ante.

Yours faithfully,

[redacted]

GEOFF. TUFFS

City of London Planning Team
Guildhall North Wing

From: Tastsoglou, Anna
To: lpaburystreet
Subject: FW: Bevis Marks
Date: 11 June 2024 15:29:23
Attachments: image002.png

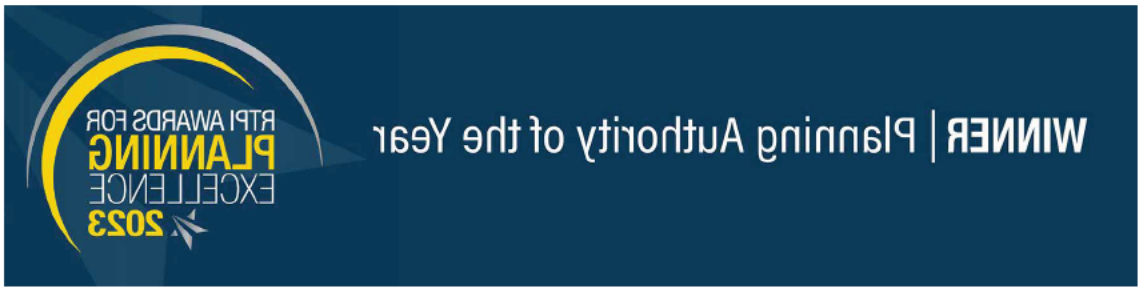
Hi all,

Please see below objection re the Bury Street application (24/00021/FULEIA).

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Charlotte D'Alton Eldridge [redacted]
Sent: Saturday, June 8, 2024 9:58 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Bevis Marks

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

I am texting in support of Bevis Marks asking please do not allow the planning for next door to the Synagogue to go ahead.

Bevis Marks is a very old historical building that surely warrants a safeguard around its' being secured safely in the City and not to be dwarfed by planning permission for a high-rise building that would completely spoil its' everyday use as a Synagogue in its' own right. I am really hoping you will not allow the building permission to go ahead for the

sake of the Jewish population within the UK for whom the Bevis Marks Synagogue has a truly real and historical significance.

With much hope and appreciation,

Charlotte D’Alton Eldridge (Mrs)

From: Tastsoglou, Anna
To: lpaburystreet
Subject: FW: 24/00021/FULEIA
Date: 17 June 2024 09:49:44
Attachments: image002.png

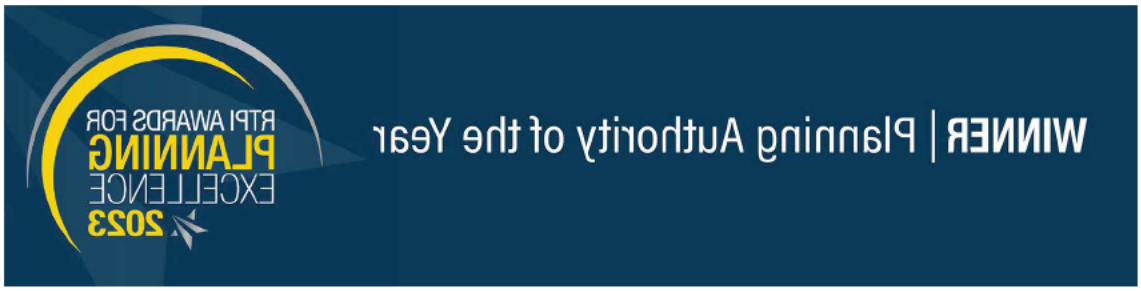
Hi all,

Please see below objection re that above development.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Jackie Philips [redacted]
Sent: Sunday, June 16, 2024 10:12 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou
I am writing to object to the proposed development around Bevis Marks synagogue for the following reasons:

- **A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.**
- It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?
- **It would destroy the southern sky view, which is an essential part of the setting**

of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.

- The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place.
- **It would overshadow the synagogue and its courtyard** for much of the day, reducing the useability of the courtyard for rituals and celebrations.
- It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.
- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.
- The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025.
- **The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny.** Many –for example, being car free, demonstrating holistic environmental design, having consolidated deliveries –are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.
- They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism.
- The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.
- The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.
- The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority.

Please keep me updated on this development.

Yours faithfully, Jackie Phillips

From: Tastsoglou, Anna
To: lpaburystreet
Subject: FW: From Rachelle Goldberg 24/00021/FU:FEIA
Date: 18 June 2024 09:15:18
Attachments: image002.png

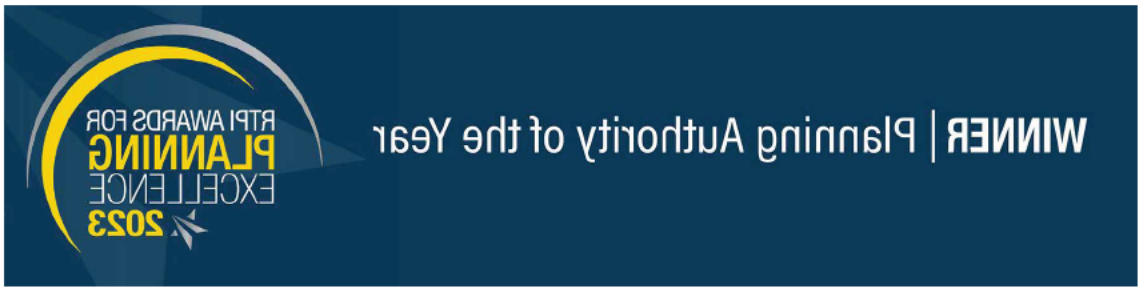
Hi all,

Please see below objection re the above application.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Rachelle Goldberg [redacted]
Sent: Tuesday, June 18, 2024 1:17 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: From Rachelle Goldberg 24/00021/FU:FEIA

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Anna,
I am extremely concerned and dismayed by the thought of the new build surrounding the beautiful Synagogue of Bevis Marks. The building and its services are a cultural treasure. Many tourists come from the U.K. to visit and indeed visitors all over the world. A number of weddings take place there Because of its authenticity it has this will withdraw the character of a very fine listed building.

With all good wishes

Yours sincerely
Rachelle Goldberg

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Planning application, 31 Bury St, ref 24/00021/FULEIA
Date:	18 June 2024 09:21:05
Attachments:	image002.png

Hi all,

Please see below objection to be uploaded on the website.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Keith Barber [redacted]
Sent: Wednesday, May 8, 2024 12:40 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning application, 31 Bury St, ref 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou

I write to register my strong objection to the above Planning Application.

I am a longstanding member of the congregation at St Botloph's Aldgate, where I have now worshipped for over 40 years. During that time I have seen the Eastern side of the City become overwhelmed by more, and ever-taller tower blocks which, in my view, have been increasingly detrimental to the environment; I question whether

most of them have been truly necessary and I find it hard to believe that yet more are considered desirable.

The above Application is, in my view, of particular concern due to its impact on Bevis Marks Synagogue. Not only is this the oldest continuously-used synagogue in Britain, it is also of tremendous cultural and religious significance to the Jewish community. The proposed development would have a massively detrimental impact on the Synagogue as it would dominate both the building and its courtyard and would interfere with its light. Moreover, I am given to understand that observation of moon and stars are religiously important in the liturgy of the Synagogue and the proposed development would entirely block the necessary sky view. Such an outcome is completely unacceptable and, even if there were no other considerations, should be sufficient grounds to reject this proposal. I do not believe a similar impact on a church would be allowed and it is entirely unacceptable that our Jewish neighbours should receive any less consideration, particularly at such an important site as this.

I need to underline my objection by reference to the context of this application. I understand there was a previous application for a very tall building on the same site as recently as 2020. It appears to me that the present application is nothing more than an attempt to overcome the rejection of that proposal by shaving a minimal amount off the height of the tower; it seems to me the present proposal is in practical terms indistinguishable from the 2020 version. I believe what was unacceptable then remains unacceptable now and the developer (and others who will be influenced by the outcome) should not be allowed to subvert the previous decision in this way.

It also should be noted that the proposed development is in a conservation area. It ought properly to go without saying that this alone should suffice as grounds for rejection. If the City Corporation allows this Application, it will effectively render designation of conservation areas meaningless. Such an outcome would be entirely unacceptable and should not be contemplated.

Finally, I wonder at the fate of a similarly unsympathetic development should one be proposed in the vicinity, say, of St Paul's Cathedral. It seems likely to me that it would be rejected out of hand - that indeed its unacceptability would be so emphatically conveyed to such a developer that the application would never even be submitted. Again, I say it is completely unacceptable that our Jewish neighbours should receive any less consideration.

On each of these grounds individually and on all of them collectively I urge you to refuse this application. So far as it is possible I urge you also to make it clear that further 'salami-sliced' applications will be viewed unfavourably and future proposals must be more appropriate to such an important and sensitive site.

Yours sincerely,
Keith Barber

From:	Tastsoglou, Anna
To:	paul frankenberg
Cc:	lpaburystreet
Subject:	RE: Synagogue s in the city.
Date:	18 June 2024 09:42:16
Attachments:	image002.png

Dear Mr Frankenberg,

Thank you for your email and apologies I have not responded earlier.

With regard to your enquiry about current vacant properties in the City, I would direct you the latest office monitoring report, which contains the most relevant information around office floorspace. The document can be found here: Local Plan Monitoring Report Offices 2022 (cityoflondon.gov.uk)

I trust the above is of some assistance.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: paul frankenberg [redacted]
Sent: Wednesday, May 1, 2024 10:29 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Synagogue s in the city.

THIS IS AN EXTERNAL EMAIL

There were two synagogues in the vicinity. Dukes place and Bevis Marks. Dukes place was bombed during the second World War and subsequently served as my warehouse until it was rebuilt as an office block with a retail ground floor which I

rented until the seventies. Bevis marks which was surrounded by my warehouses is an extraordinary example of a virtually handbuilt wooden interior which most councils would promote as an outstanding building. When I was on the corporation there was a committee dedicated to the preservation and promotion of such glorious buildings. It seems a shame that the only building left of the vast Jewish population is to be overshadowed by yet another unrented office block. Perhaps you could let me know the current vacant property percentage in the city.
Regards
Paul Frankenberg.

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	FW: Applications 24/00021/FULEIA & 24/00011/LBC
Date:	20 June 2024 15:57:59
Attachments:	image002.png

Hi all,

Can the representation submitted by Mr Hoefling please be amended to refer to the Honourable Company rather than himself?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Roger Hoefling [redacted]
Sent: Wednesday, June 19, 2024 3:07 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Applications 24/00021/FULEIA & 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Thank you for your acknowledgement today of receipt of the revised representations made on behalf of the Honourable Company of Master Mariners in connection with the above applications.

Currently, the original representations of 14th May appear online but may I take it that they will be replaced by their replacements in due course? Indeed, should the option be available, listing them in the name of the Honourable Company rather than myself would be more

appropriate, if I may.

Again, my thanks.

Roger Hoefling
[redacted]

From:	Roger Hoefling
To:	Tastsoglou, Anna
Cc:	lpaburystreet
Subject:	RE: Applications 24/00021/FULEIA & 24/00011/LBC
Date:	20 June 2024 20:59:29
Attachments:	image002.png

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Replacement of the current document dated 14th May 2024 by that shown as '14th May 2024; revised 12th June 2024' is requested, please. I sent the latter via your colleague, Kieran McCallum, on 18th June. Mr McCallum's e-mail address had proved reluctant, hence the delay.

Similarly, while not insisting on anonymity, my submissions are on behalf of the Honourable Company of Master Mariners, a City livery company, and so giving preference to its name would be appreciated, if I may

Welcoming questions, my thanks.

Roger Hoefling
[redacted]

From: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Sent: 20 June 2024 15:57
To: Roger Hoefling <[redacted] lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: RE: Applications 24/00021/FULEIA & 24/00011/LBC

Dear Mr Hoefling,

Thank you for your email.

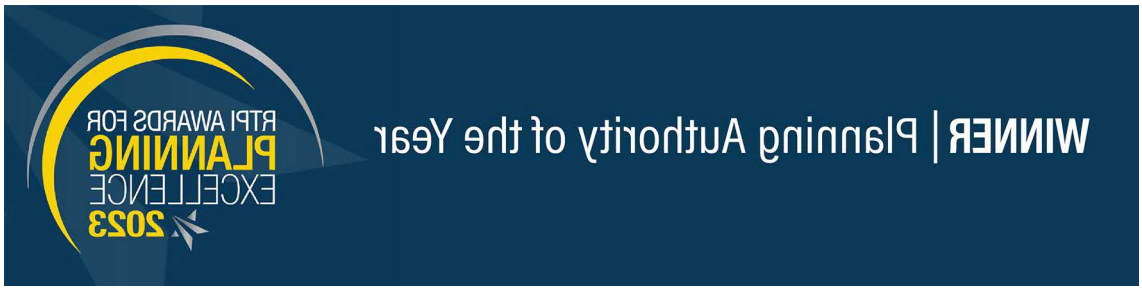
Can I just confirm that you are requesting for the previous representation on the 14th to be replaced with the latest one submitted a couple of week ago? We can keep both representations if you wish to and if they raised different matters.

I will ask my colleagues in the planning support team to change the name of the consultation to the Honourable Company than your name.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



From: Roger Hoefling [redacted]
Sent: Wednesday, June 19, 2024 3:07 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Applications 24/00021/FULEIA & 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Thank you for your acknowledgement today of receipt of the revised representations made on behalf of the Honourable Company of Master Mariners in connection with the above applications.

Currently, the original representations of 14th May appear online but may I take it that they will be replaced by their replacements in due course? Indeed, should the option be available, listing them in the name of the Honourable Company rather than myself would be more appropriate, if I may.

Again, my thanks.

Roger Hoefling
[redacted]

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Virus-free.www.avg.com

From: Tamuglou, Anna
To: [redacted]
Subject: FW: Comment on 24/00021/FULEIA
Date: 26 June 2024 12:52:36

Hi all,

Can the following objection please be uploaded on the website?

Thank you,

Anna

Anna Tamuglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tamuglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fdata 05%7C02%7Cplanarymeet%40cityoflondon.gov.uk%7Coradffc21754b4f06fec4f08dc95d677ba%7C59e658cdb3cd4056851932225fa90be8%7C0%7C0%7C638549995528455315%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata fZKH0mPuGB9gT%2F1SS3VojU1V2k9vIQRDxSq5%2FESoiI%3D&reserved 0

-----Original Message-----
From: [redacted]
Sent: Thursday, May 16, 2024 3:01 PM
To: Tamuglou, Anna <Anna.Tamuglou@cityoflondon.gov.uk>
Subject: Comment on 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Hello Anna Tamuglou, Case Officer,

I am writing to state my wholesale opposition to this application (24/00021/FULEIA), as I feel it is entirely inappropriate for the setting. I have worked in the City of London for a number of years now and hopefully will continue to for many years to come. I pass the area almost daily, walking from Liverpool Street.

A 45 story building is whole inappropriate to be built so close to Bevin Marks, by some measures *the* most important Jewish historical, cultural, and religious site in the entirety of the UK and a Grade I listed building. The proposed building would hamper religious use of Bevis Marks - limiting sight of stars and moon for example, and limiting use of the courtyard which is essential to some festivals, by casting it into constant darkness.

There are many tall buildings in the City, and many appropriate places for them. There *is*, and can be, only *one* Bevis Marks and it would be a disgrace if these plans were to go ahead.

Kind Regards,

Agniya Domnach
Buxton Road
London

24/00021/FULEIA

BGO's development initiatives, particularly the planned redevelopment of Holland House, demonstrate their dedication to transformative projects that catalyse both economic and cultural growth. BGO envisions the Museum of Diversity as an integral part of the city's landscape, where history, technology, and humanity converge to inspire future generations through unique architecture and exhibits showcasing artifacts from diverse cultures worldwide.

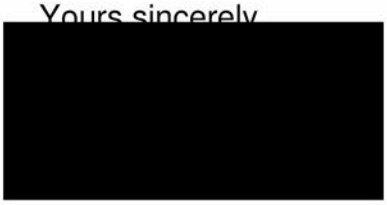
Furthermore, the City of London has a rich history of supporting the arts and museums, as evidenced by the success of the Museum of London and other institutions, which have become hubs of community engagement and cultural education. We foresee a partnership with BGO that will enhance our ongoing efforts to celebrate diversity, promote equality, and provide inclusive cultural education to all residents and stakeholders.

The anticipated establishment of the Museum of Diversity in the City of London is expected to create approximately 300 employment opportunities across various levels, significantly advancing our community's economic landscape. Moreover, the initial phase of this project, with an estimated investment of £1.2 million, will serve as a cultural beacon and a collaborative nexus for partners dedicated to showcasing the rich tapestry of our shared human experience.

The Museum of Diversity is ready to collaborate with the City of London to facilitate the establishment of BGO's cultural space at Holland House. We eagerly anticipate discussing the potential design and use of the space and are prepared to assist and support in their application or regulatory processes to expedite this exciting project.

We look forward to the Museum of Diversity joining the tapestry of the City's cultural landscape and becoming a beacon of inspiration, learning, and unity. Together, we can create a future where diversity is recognised and revered.

Yours sincerely



Mr. Troy Richards [Founder & CEO] & Tessa Sanderson OBE [Ambassador of MoD]
Troy@museumofdiversity.org

From: Tastsoglou, Anna
To: [redacted]
Subject: FW: 24/00021/FULEIA
Date: 26 June 2024 12:56 03
Attachments: image002.png

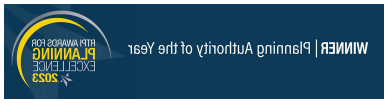
Hi all,

Can the objection email at the bottom of this email trail please be uploaded on the website?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk



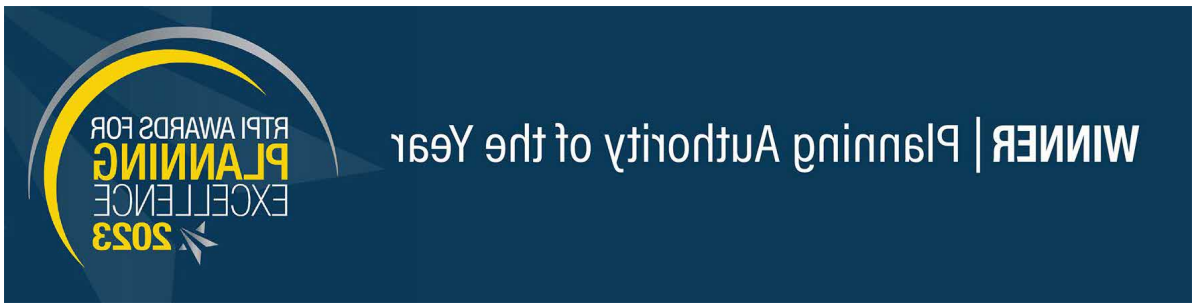
From: Freddy Salem [redacted]
Sent: Monday, June 3, 2024 2:46 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon gov.uk>
Subject: Re: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Mrs Tastsoglou

Thanks for this.
My representation relates to the application currently being considered at Bury street and its impact on Bevis Marks Synagogue.
Regards
Freddy Salem

On Mon, 3 Jun 2024 at 14:37, Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk> wrote:

> Dear Mr Salem,
>
> Thank you for your representation.
>
> I understand that your representation relates to the Local Plan than the application currently being considered at Bury Street, albeit the reference number of the application is stated as the subject of your email.
>
> I would appreciate if you could confirm the above is correct, so that your representation is taken into consideration regarding the relevant matter of your concern.
>
> Kind regards,
>
> Anna
>
> **Anna Tastsoglou | Principal Planning Officer (Development Management)**
> Environment Department | City of London | Guildhall | London EC2V 7HH
> 07751 731282
> anna.tastsoglou @cityoflondon.gov.uk | www.cityoflondon.gov.uk
>
> 
>

From: Freddy Salem [redacted]
Sent: Tuesday, May 28, 2024 3:57 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I make this representation that the Local Plan 2040 as drafted is not sound. I make this representation generally, but specifically in respect of Policies HE1, S12 and S13 and the Policies Map.

I consider the draft unsound on the following grounds:

HE1 does not adequately protect heritage assets. It is not enough that development should "consider" enhancing conservation areas; enhancement should be actively sought and pursued. HE1 also does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue's defined immediate setting"; however no such concept of immediate setting exists. As with other heritage assets, the whole setting of the Synagogue should be protected. This is particularly important because the Synagogue is included in the Tall Buildings Area, and the permissible height contours in Figures 14 and 15 clearly impinge upon the Synagogue and its setting.

S12 and S13 tall buildings policies are also inadequate. They should not simply "take into consideration local heritage assets" as 12(5) states, but must pay full regard to and preserve and enhance the significance of those assets. S13 should protect views of and from the Synagogue in a similar way to the way The Monument is treated, albeit special regard should also be paid to the culturally and religiously important setting of the Synagogue.

The current Local Plan Policy CS14 presumption against tall buildings in Conservation Areas must be retained in the new draft. As well, a sentence should be added to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to add or amend my proposed changes [and I should welcome being invited to participate in discussion at the Plan's examination].

Yours truly
Freddy Salem

Freddy Salem
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From: Tastsoglou, Anna
To: Deborah Carp
Cc: Spbarrystreet
Subject: RE: 24/00021/FULEIA
Date: 28 June 2024 12:23:59

Dear Mrs Carp,

Yes, that is right, but as I said in my previous email, this has not been agreed yet.

Kind regards,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data 05%7C02%7Cspbarrystreet%40cityoflondon.gov.uk%7C1ba10de00c3149bd8b3308dc9764acb9%7C56e65dbcdb3cd4056851932226fa98be8%7C0%7C0%7C638551705843839611%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata GPmRgK%2Bm7iBY5J2ImxNoe1w3LZWy6xYDYYMHPCwbAuM%3D&reserved 0

-----Original Message-----
From: Deborah Carp [redacted]
Sent: Friday, June 28, 2024 10:46 AM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Cc: Spbarrystreet <Spbarrystreet@cityoflondon.gov.uk>
Subject: Re: 24/00021/FULEIA

[You don't often get email from [redacted]. earn why this is important at https://aka.ms/LearnAboutSenderIdentification]

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Many thanks for your response. By end of Autumn are you meaning October/November time, please?

With kind thanks,

Debbie

Sent from my iPhone

> On 28 Jun 2024, at 10:35, Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk> wrote:
>
> Dear Mrs Carp,
>
> Thank you for your email and apologies I have not responded earlier.
>
> Although the committee date has not been agreed yet, it is anticipated that the proposed development will be presented at an end of Autumn committee meeting.
>
> I trust the above is of some assistance.
>
> Kind regards,
>
> Anna
>
>
> Anna Tastsoglou | Principal Planning Officer (Development Management)
> Environment Department | City of London | Guildhall | London EC2V 7HH
> 07751 731282
> anna.tastsoglou@cityoflondon.gov.uk |
> https://gbr01.safelinks.protection.outlook.com/?
> url http%3A%2F%2Fwww.c%2F&data 05%7C02%7Cspbarrystreet%40cityoflondon.gov.uk%7C1ba10de00c3149bd8b3308dc9764acb9%7C56e65dbcdb3cd4056851932226fa98be8%7C0%7C0%7C638551705843847861%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata xoamdrp8%2BOBSc%2BK6tnpBfCxM7X0%2F6G1Yaq%2BPnJcXwfj4%3D&reserved 0
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> -----Original Message-----
> From: Deborah Carp [redacted]
> Sent: Monday, June 3, 2024 5:43 PM
> To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
> Subject: 24/00021/FULEIA
>
> THIS IS AN EXTERNAL EMAIL
>
>
> Dear Ms Tastsoglou,
>
> Please could you let me know when a decision will be reached to save the Bevis Marks historic synagogue from the wild notion of a high rise buildings for which a second planning application has been submitted?
>
> I would be glad to know of at least when the council's planning committee will convene to decide on this.
>
> Many kind thanks,
>
> Yours sincerely,
>
> Mrs Debbie Carp
>
>
>
> Sent from my iPhone
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> ata DpdwCXjesIs6quFdRiV1rxZ%2BMcz9ejJ9UuQ2EInsY%3D&reserved 0

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

8th May 2024

Dear Sir/Madam,

At its meeting on 25th April 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.64 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street, London EC3A 5AR
Creechurch Conservation Area/Aldgate Ward. No Ward Club rep.
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/cafe (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

The Committee strongly objected considering that the development proposals would result in the gross overdevelopment of this site in the Creechurch Lane Conservation Area, with a significantly negative impact on the character and appearance of the immediate Conservation Area and its setting. The proposals were considered to be highly damaging to the local townscape quality in the nearby street-scene context, with harmful consequences for important listed buildings that were in close proximity. The lack of architectural quality and refinement of the proposals was noted, together with their significant negative impact on wider townscape views and heritage context of the site's City/central London location.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

[redacted]

Mrs. Julie Foxa
Secretary

From:	carmen gleen
To:	Planning Policy Consultations
Subject:	31 Bury Street
Date:	29 May 2024 15:48:49

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I make this representation that the Local Plan 2040 as drafted is not sound. I make this representation generally, but specifically in respect of Policies HE1, S12 and S13 and the Policies Map.

I consider the draft unsound on the following grounds:

HE1 does not adequately protect heritage assets. It is not enough that development should "consider" enhancing conservation areas; enhancement should be actively sought and pursued. HE1 also does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue's defined "immediate setting"; however no such concept of immediate setting exists. As with other heritage assets, the whole setting of the Synagogue should be protected. This is particularly important because the Synagogue is included in the Tall Buildings Area, and the permissible height contours in Figures 14 and 15 clearly impinge upon the Synagogue and its setting.

S12 and S13 tall buildings policies are also inadequate. They should not simply "take into consideration local heritage assets" as 12(5) states, but must pay full regard to and preserve and enhance the significance of those assets. S13 should protect views of and from the Synagogue in a similar way to the way The Monument is treated, albeit special regard should also be paid to the culturally and religiously important setting of the Synagogue.

The current Local Plan Policy CS14 presumption against tall buildings in Conservation Areas must be retained in the new draft. As well, a sentence should be added to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to add or amend my proposed changes [and I should welcome being invited to participate in discussion at the Plan's examination].

Yours,

Carmen Gleen

Flat 7 Garden Court
Garden Road
London
NW8 9PP
[redacted]

29th May 2024

TO WHOM IT MAY CONCERN

Dear Sir/Madam,

Concerning proposed development of a tall tower at 31 Bury Street

I make this representation that the Local Plan 2040 as drafted is not sound. I make this representation generally, but specifically in respect of Policies HE1, S12 and S13 and the Policies Map.

I consider the draft unsound on the following grounds:

HE1 does not adequately protect heritage assets. It is not enough that development should "consider" enhancing conservation areas; enhancement should be actively sought and pursued. HE1 also does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue's defined "immediate setting"; however, no such concept of immediate setting exists. As with other heritage assets, the whole setting of the Synagogue should be protected. This is particularly important because the Synagogue is included in the Tall Buildings Area, and the permissible height contours in Figures 14 and 15 clearly impinge upon the Synagogue and its setting.

S12 and S13 tall buildings policies are also inadequate. They should not simply "take into consideration local heritage assets" as 12(5) states, but must pay full regard to and preserve and enhance the significance of those assets. S13 should protect views of and from the Synagogue in a similar way to the way The Monument is treated, albeit special regard should also be paid to the culturally and religiously important setting of the Synagogue.

The current Local Plan Policy CS14 presumption against tall buildings in Conservation Areas must be retained in the new draft. As well, a sentence should be added to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to add or amend my proposed changes [and I should welcome being invited to participate in discussion at the Plan's examination.

Yours faithfully

Alfred Magnus

Former President of the Board of Elders of the Spanish & Portuguese Synagogue

should be added to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to add or amend my proposed changes [and I should welcome being invited to participate in discussion at the Plan's examination

בס"ד

the S&PHARDI community ק"ק שער השמים

Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

Ref: 24/ 00021/ FULEIA

28th June 2024

Dear Ms Tastsoglou,

Please excuse the delay in this consultation response. When Shravan Joshi invited me to meet with him on 18 April 2024, he cautioned me and my community from objecting to Welput's latest proposal on account that they would be amending it and it would look bad if we objected before giving them an opportunity to do so. As that has not transpired, I find myself now forced to object as I had originally intended to do so.

You will no doubt be aware of the strength of feeling around this submission, and I share in that deep disappointment. As the Senior Rabbi of the S&P Sephardi community, the custodian of Bevis Marks Synagogue, I am aware of the severe distress this application has caused, the waste of community resources it has engendered, and of the complete disregard it has shown for the needs of the Jewish community.

I've already submitted a detailed account appended to the synagogue's formal objection outlining the diminution of our religious practices that would result should this application be approved. Please see there for more information. But in short, the proposed tower would block out views of the southern sky necessary for Jewish worship, in particular the necessary views of the moon in the night sky for the Kiddush Levana prayer. Jewish tradition also strongly prefers that synagogue worship more generally include sky views, and clearly this was intended in the original design of the Bevis Marks synagogue with it numerous windows. This would no longer be possible should the tower at 31 Bury st be permitted. Finally, the further reduction in sunlight falling on the entirety of the synagogue site that would result from such a tower, would also harm the community's ability to worship as it has for over three centuries. This is both a breach of our religious rights, but it is also in conflict with the original design of the building, intended to be usable by daylight, which was an intentional departure from medieval buildings or houses of worship with stained glass windows.

More fundamentally, it is shameful that our community is forced to campaign once again to protect Bevis Marks Synagogue, when it should already be abundantly clear that it is in need of protection from circumstances such as this. That the City of London has as of yet refrained from formulating policies that would prevent this harm from even being proposed is a dereliction in their duty of care, and it demonstrates a disdain and disregard for the well-being of the UK's oldest Jewish community. At a time of increasing AntiSemitism in this country, I expect more from the City.

The S&P Sephardi Community

2 Ashworth Road, London, W9 1JY
Tel: 020 7289 2573
info@sephardi.org.uk
www.sephardi.org.uk

The home of the Sephardi community since 1656

S&P Sephardi Community is the working name of charities in connection with the Spanish and Portuguese Jews' Synagogue
Registered charity number 212517

the S&P HARDI community ק"ק שער השמים

Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

I call upon the City to refuse this proposal without caveat and ensure the long-term protection of Bevis Marks Synagogue.

[redacted]

Rabbi Joseph Dweck
Senior Rabbi

The S&P Sephardi Community

2 Ashworth Road, London, W9 1JY
Tel: 020 7289 2573
info@sephardi.org.uk
www.sephardi.org.uk

The home of the Sephardi community since 1656

S&P Sephardi Community is the working name of charities in connection with the Spanish and Portuguese Jews' Synagogue
Registered charity number 212517

By Email: anna.tastsoglou@cityoflondon.gov.uk

RIGHT OF LIGHT CONSULTING
Chartered Surveyors

Right of Light Consulting
Burley House
15-17 High Street
Rayleigh
Essex
SS6 7EW
TEL 0800 197 4836
E-MAIL enquiries@right-of-light.co.uk
WEBSITE www.right-of-light.co.uk

Anna Tastsoglou
City of London
Guildhall
London
EC2V 7HH

17 July 2024

Dear Ms Tastsoglou

Application Reference No. 24/00021/FULEIA
Proposed Development at Bury House, 1-4 & 31-34 Bury Street, London EC3A 5AR
Impact on 11-12 Bury Street, London EC3A 5AT

We are appointed by The Texel Group following concerns that the proposed 43 storey redevelopment of Bury House will impact upon the daylight and sunlight receivable by their property at 11-12 Bury Street.

Our client is disappointed that they have been obliged to respond negatively to the application, but feels compelled to oppose a development which will have an oppressive and overbearing impact on the way the occupiers of the building enjoy the property.

The Building Research Establishment (BRE) "Site Layout Planning for Daylight and Sunlight 2022, 3rd Edition provides guidance for the planning department to consider.

The introduction to the BRE guide at 1.1 states that "people expect good natural lighting in their homes and in a wide range of non-domestic buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by. Access to skylight and sunlight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements."

We have reviewed the daylight and sunlight study dated January 2024 prepared by GIA Chartered Surveyors on behalf of the applicant. The report analyses the impact on the neighbouring properties which surround the proposal, including St Andrew Undershaft Church, 2 & 4 Heneage Lane, St Helens Church, St Katherin Cree Church, Sir John Cass Primary School, 2-20 Creechurch Lane & 27-31 Mitre Street. 11-12 Bury Street has not been considered.

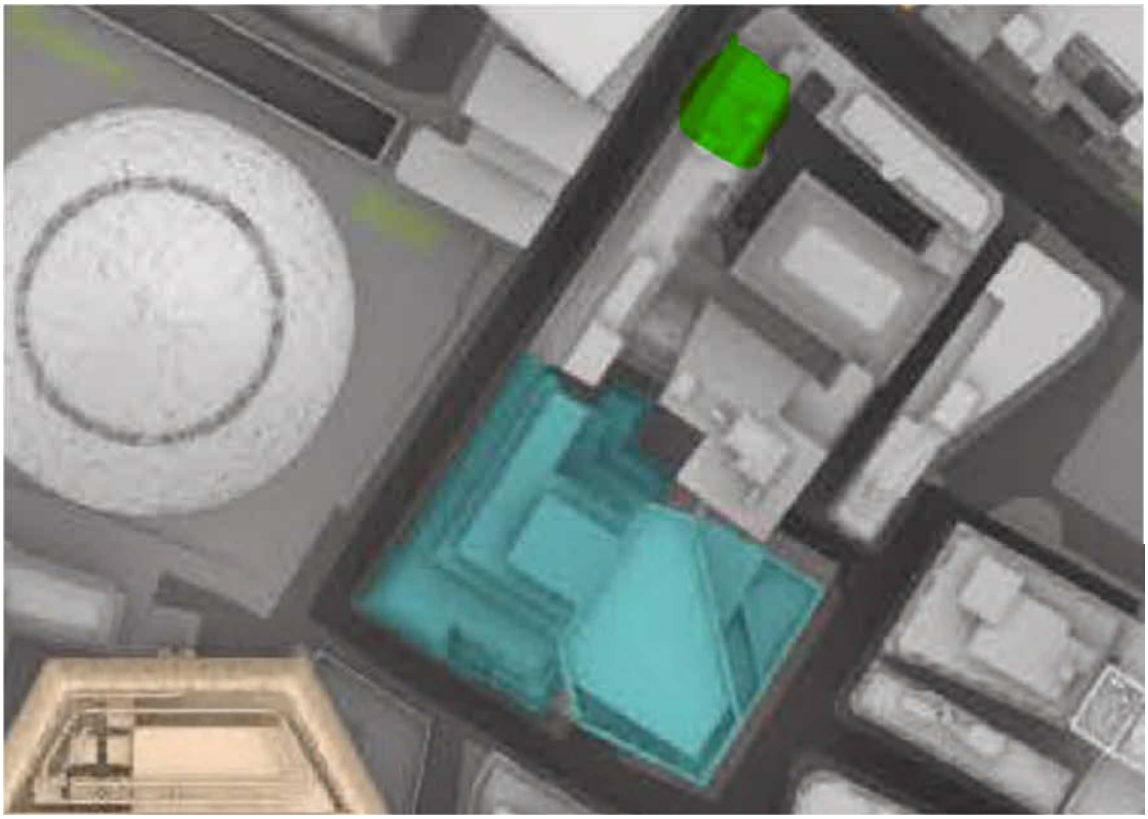
Given the scale of the proposal and the proximity with our client's property, along with the fact the proposed 43 storey tower is located to the south of our client's windows & external rooftop amenity area, we are of the opinion that the daylight and sunlight assessment should encompass the impact on 11-12 Bury Street.

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Right of Light Consulting Ltd
Registered in England and Wales
No. 5908040

Registered Office:
Burley House,
15-17 High Street, Rayleigh,
Essex SS6 7EW

The below images have been taken from the daylight and sunlight report completed by GIA, and they show the proposed development in blue. I have highlighted in green the position of 11-12 Bury Street on the plan and isometric views below.



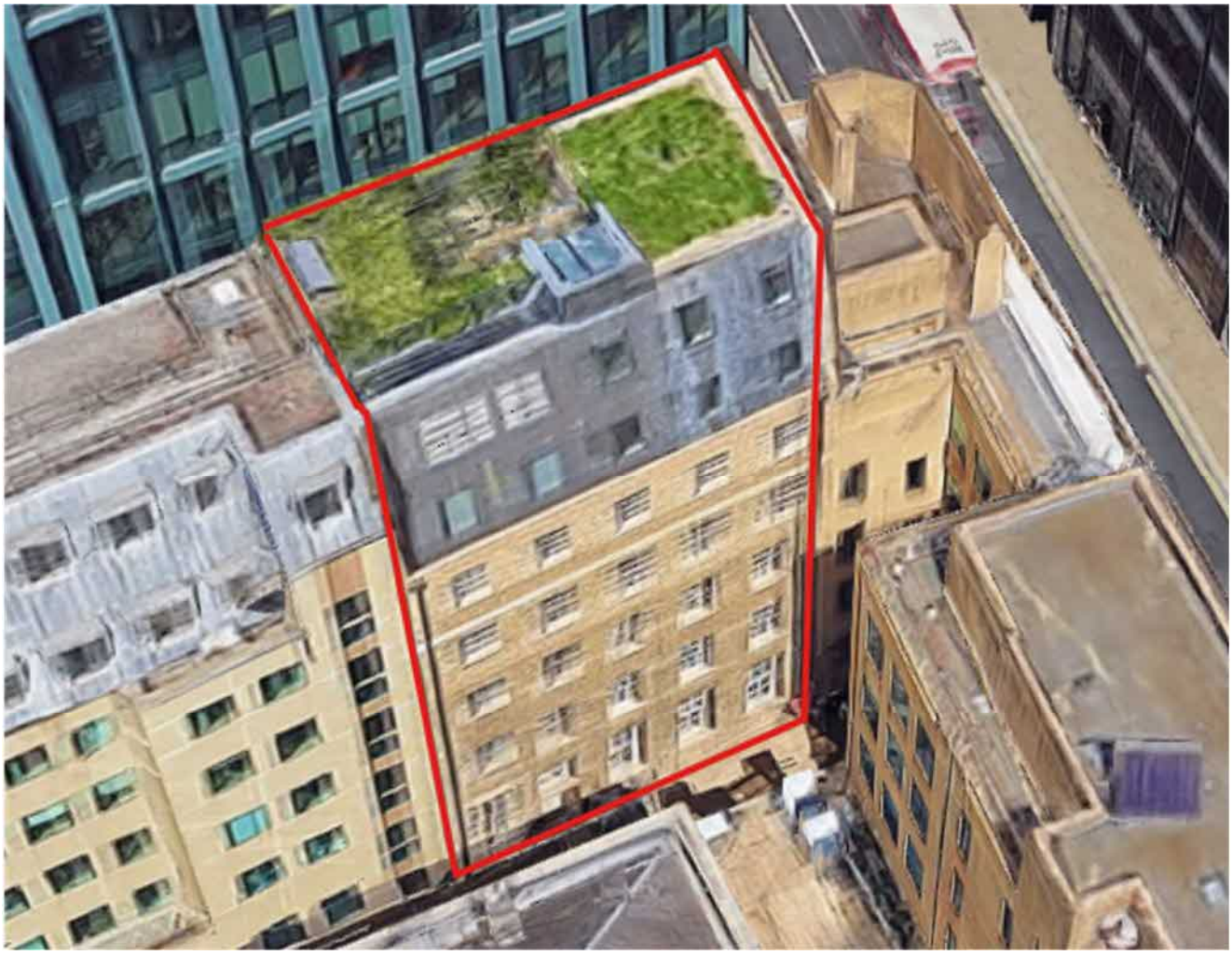


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As you can see, the rear of our client's building does not directly face the proposed tower. However, this does not necessarily mean that daylight and sunlight will not be adversely affected. The reason for this, is that in this dense urban environment, daylight and sunlight to windows is naturally more scarce. Therefore, given the BRE daylight and tests allow for a 20% reduction from their current value, poorly lit windows have less daylight and sunlight they can afford to lose before hitting this threshold. This is the case with 11-12 Bury Street which is already hampered by the existing buildings surrounding it on all sides.

I have highlighted the rear elevation of 11-12 Bury Street below which faces southeast. Given the orientation of these windows, and that the proposal is located to the south of them, our clients are concerned with the impact on the sunlight the windows are able to receive, particularly in the winter months, when ordinarily the windows would benefit from solar gain from the south.



We can appreciate that focus tends to be towards habitable rooms at domestic premises in daylight and sunlight studies. However, despite 11-12 Bury Street being of non-residential use, we are of the opinion that it should be included in the analysis to demonstrate the level of compliance with the BRE guideline tests, particularly given the direct impact on the occupiers who will be subject to working in gloomier office spaces.

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Furthermore, in recent years there has been a significant increase in the conversion of commercial to residential properties, which seems likely to persist in the long term due to changing demands in the property market. As such, we are of the opinion that considering the impact on natural light to all buildings is even more important, to ensure future occupiers will be able to enjoy good levels of light.

So we are able to advise our clients on the loss of light to their building, we request that no decision is made in favour of the application until:

1. The applicant instructs their surveyor to visit our client's property and submits a complete and accurate daylight and sunlight assessment prepared in accordance with the BRE guide, and

2. The assessment shows that the proposed design, or amended design, complies with the BRE guide.

We understand that you have yet to visit our client's property. We look forward to liaising with you for a convenient time you will be able to visit and evaluate the reduction of light from our client's perspective.

In addition to planning, we understand that our client's property benefits from a legal right of light. We invite the applicant to engage with us to resolve all potential right of light matters. This is to avoid a situation where planning permission is granted for a development that cannot be built due to legal right of light restrictions.

Please acknowledge receipt of this letter and confirm that no decision will be made until the above points are addressed.

I look forward to hearing from you.

Yours sincerely

[redacted]

Joe Palmer *BEng (Hons) DIS*
Senior Right of Light Surveyor

Direct Dial: [redacted]
Email: [redacted]

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בס״ד

The Rt Hon. The Lord Mayor,
Alderman Professor Michael Raymond Mainelli

By email: michael.mainelli@cityoflondon.gov.uk

Office of The
CHIEF RABBI

305 Ballards Lane
London N12 8GB
020 8343 6301
info@chiefrabbi.org
chiefrabbi.org

15 May 2024

Ref: 24/00021/FULEIA

Dear Lord Mayor Mainelli,

It is with considerable concern that I write to you as I did to your predecessor Alderman William Russell in March 2021. It was then that I wrote to object to the proposal to construct a tower on the site of 31 Bury Street, due to the significant harm it would cause to Bevis Marks Synagogue. I am saddened to do so again despite its refusal two years ago and would be grateful if my objection can be recorded by the relevant authorities.

As you will know, Bevis Marks is the oldest synagogue in the UK in continuous use, and a deeply resonant symbol of the history of British Jewry. In the 320 years since the synagogue was built, the UK Jewish community has become a valued part of the fabric of British society. Bevis Marks Synagogue was one of the first major synagogues to be constructed following the resettlement of Jews in England in 1656. It has stood as a reminder of that history, and of how much has been achieved since members of the Jewish faith were permitted to return to this country.

I have been troubled to read that there is now another proposed development on the doorstep of the synagogue, with very limited changes to the original proposal, with the potential to significantly affect the natural light that can reach the building. This will, in turn, disrupt prayers taking place inside, and the use of the courtyard outside. It would have a notable impact on the atmosphere that Bevis Marks is so famed for around the Jewish world, to the detriment of those worshipping there.

Beyond this, by further reducing views of the southern exposure sky, this proposal would have implications for worshippers at Bevis Marks wishing to recite the monthly prayer *kiddush levana*, recited after nightfall upon seeing the waxing moon in the sky. The granting of permission to this proposal would therefore be a regrettable development with implications for rights of religious practice, precisely in the place where Jews first enjoyed these rights in England following the 17th century resettlement. That would be a tragic irony.

It was my hope that the City's new Creechurch Conservation Area would serve to protect Bevis Marks Synagogue from this type of scenario. I am disappointed that this seems now to not be the case. I trust that this can be rectified with some adjustments in the new local plan, ensuring that the synagogue's southern exposure remains unobstructed.

Thank you for your consideration of this matter.

Yours sincerely,

[redacted]

Chief Rabbi Sir Ephraim Mirvis KBE

עץ חיים היא למחזיקים בה · IT IS A TREE OF LIFE FOR THOSE WHO GRASP IT ·

VOCES8 Centre, VOCES8 Foundation, St Anne & St Agnes, Gresham Street, London, EC2V 7BX

Planning Department
City of London Corporation
Guildhall, PO Box 270
London, EC2P 2EJ

16th August 2024

Dear Planning Department,

Re: Support for Planning Application 24/00021/FULEIA - Holland House, London EC3A 5AR

I am writing to express my support for the planning application for the development of Holland House, London EC3A 5AR as a flexible community, education, cultural, and amenity space.

The VOCES8 Foundation is a vocal music education charity based in the Wren church of St Anne & St Agnes near St Paul's cathedral. We discovered Holland House through our work hosting Citizens of the World refugee choir and have used the space for filming a forthcoming album release and have rehearsals lined up for the autumn. We are often over subscribed here at the VOCES8 Centre and we are now directing many arts creatives, educators and musicians to the space.

In our experience of offering an arts based space in the city, transforming Holland House into a multifunctional space will bring considerable benefits to the local community and wider society. It will provide a much-needed venue where people of all ages and backgrounds can engage in a diverse range of cultural, educational, and community activities. Musicians find it particularly hard to find spaces in the City that are quiet, roomy and professional at a reasonable hire fee, so proposed flexible spaces within Holland House will serve as a vital resource for our musicians, singers, workshop leaders, educators and the general public.

The application's emphasis on education aligns with the city's broader goals of promoting lifelong learning and supporting youth engagement. The integration of educational programs, particularly in the arts within Holland House will provide invaluable resources for schools, young people, professional and aspiring musicians, fostering creativity and talent within the community.

I support the planning application for Holland House and I am confident that this project will make a significant positive contribution to the City.

Thank you for considering my views.

Yours faithfully,

[redacted]

Jan Keliris(she/her)
Centre Director

VOCES8 Foundation
VOCES8 Centre
St Anne and St Agnes Church
Gresham Street
London EC2V 7BX
United Kingdom

Home of the VOCES8 Foundation

centre@voces8.foundation

www.VOCES8.foundation

A centre of Performance, Education and Community and home to the charity, The VOCES8 Foundation. Every Hire at the VOCES8 Centre directly contributes to our community education projects in London and around the world.

Watch a video on our education projects here.

Lydia Samuels

SINGER + COMPOSER

Lydia Samuels
55 Greenfield Road
London N15 5EP
M: [redacted]
email: [redacted]

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

August 20th 2024

Dear Anna Tastsoglou,

I am writing in support of WELPUT's proposals for the future development of Bury House, Holland House, and Renown House - planning application reference 24/00021/FULEIA.

I am a musician and composer who is currently leading on the Arts Council-funded community arts project *Voices That Wander*. A significant portion of our rehearsals took place at Holland House and the use of this space for rehearsals was invaluable to the project. *Voices That Wander* is a project that brings together diverse groups from different generations and backgrounds to explore traditional Jewish music and its connections with Arabic music. *VTW* is about exploring musical traditions and bringing these to life in the context of social cohesion.

Rehearsal space in London is incredibly costly, and for a project such as mine on a fairly low budget being able to have access to the space was so important to make our project work. The use of Holland House allowed this project, which has brought creativity and music to hundreds of people in different communities in London, to thrive. This was my first major project as a composer and project leader, so access to Holland House has been key in the development of myself as a burgeoning artist.

I hope you'll consider the impact that Holland House has had upon artistic projects such as mine when you reflect upon the WELPUT's application, as it truly has made such a difference to mine.

All the best,

Lydia

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

28 August 2024

Dear Anna,

I am writing in support of WELPUT's proposals for the future development of Bury House, Holland House, and Renown House - planning application reference 24/00021/FULEIA

One of my productions - *Quiet Songs* - produced by Oedipa is rehearsing at Holland House. It is the winner of the Oxford Samuel Beckett Theatre Trust Award, which includes presentation at the Barbican and a production grant, but even with this support we were struggling to find a rehearsal venue within our slender means (Oedipa is a registered charity), as London venue hire is prohibitively expensive. Being welcomed into Holland House for our rehearsal period has not only provided us with the space we need, but also expanded the supporting community around this production, which is working inclusively and collaboratively, with access provision as part of the process rather than bolted on as extra.
https://www.barbican.org.uk/whats-on/2024/event/finn-beames-company-quiet-songs

It is very exciting to see the plans for Holland House, with my interest particularly drawn to the proposed workshops and theatre spaces, given the central London scarcity of flexible, smaller scale venues that offer audiences a close-up, and participants hands-on, experiences. My post-pandemic work has underlined how much people want, and need, to connect and attune with each other in community. This is also proven to improve social cohesion, quality of life and significantly boost mental health. (I have a specialism in trauma-informed care within performing arts processes, with projects ranging from professional productions on world stages to locally-embedded community projects, such as co-created pieces performed by and for the community).

The research and consultation that has gone into the proposal is coherent and rigorous, evident in the forms of activities and services proposed, envisioning Holland House as a vibrant cultural hub rooted in and serving its local community.

I hope you will bear these thoughts in mind when considering WELPUT's application

Yours sincerely

[redacted]

Claire Shovelton
Claireshovelton.uk

Creative Producer Oedipa
Creative Producer CHROMA
Creative Producer Second Movement
Creative Producer *Shorelines*, co-created community fable: Deal Music and Arts
Consultant Citizens of the World the UK's leading refugee choir

Registered charitable incorporated organisation in England and Wales
Registered charity no. 1171656
Registered office: 20 Homefield, Stroud, GL6 0SP UK

The Black Secret
85 Great Portland Street
First Floor,
London, W1W 7LT
Creative Director – Jeorge Asare-Djan
info@theblacksecret.co.uk
www.theblacksecret.co.uk

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

Friday 6th of September

Dear Anna,

I am writing on behalf of the Black Secret Education project in support of WELPUT's proposals for the future development of Holland House, Bury House and Renown House - planning application reference 24/00021/FULEIA.

As an independent education platform focused on bringing a dynamic level of accessibility to the study of Black and African History to the general public, through presenting the rich Histories of the African Continent and her peoples throughout the Diaspora in an inspiring, engaging and comprehensive manner. We have an online platform which is connecting students of all ages around the world to our learning community. Alongside our online content we also host a range of 'physical' live events as part of our outreach programme, primarily in the London area, but also at times we have been involved with cultural events run by other organisations taking place in Birmingham and speaking engagements across the Midlands, Manchester and Liverpool.

One of our strategic partners, Troy Richard's of The Museum of Diversity introduced us to Holland House and suggested that it could be a suitable location for our forthcoming program of live events. Infact, due to its central location, Holland House is ideal for many of the types of events we typically hold, and it also gives us an opportunity to increase the number of events we could potential hold annually. A constant challenge for us when it comes to holding live events in London is finding a suitable location at a 'reasonable' rate. For example, in previous years we used the Ambassadors Bloomsbury Hotel in Euston for our Inaugural launch event.

Last year in partnership with African Ancestry (a pioneering DNA company) we organised an event for African Ancestry's first visit to UK as part of their 20th Anniversary celebration tour at the Ambassadors Bloomsbury, which ended up being a huge success. However, in less then a year the price of hire for the Ambassadors Bloomsbury main event suite had more than doubled, making it challenging to hold multiple events at such locations. It's the same throughout the capital at present. There is a need for such initiatives as the WELPUT proposal for bringing social and cultural initiatives back to the centre of London.

For example, we often deliver guided tours of the British Museum to visitors from the Midlands and tourist from America. By having access to a central London location such as Holland House, we can also hold lectures related to the exhibits our visitors have experienced afterwards at Holland House. For visitors from outside of London, or indeed from abroad, central London is ideal for such activities. We also intend to hold a similar program with school children, there is so much interesting history almost literally at every turn and corner in central London, we will also be taking groups of school children on history walks through the streets of London and then bringing them back to Holland House for lessons on what they have seen and experienced. We have many ideas and ways of bringing history to life which we are now in a position to action, because of the opportunities that are available through Holland House.

Early last month, we actually did some principal filming for our next online module of content on the 6th floor of Holland House. This particular module is going to be aimed at a younger audience, which will also be designed with a focus of catering to multiple generational study, to allow for families to learn and study together side by side. From our viewpoint Holland House is a dynamic building, in a great location which offers multiple opportunities and usages of its space. It offers a versatility of options, from facilitating more intimate teaching experiences to catering for larger scale lectures and cultural events, all of this is possible at Holland House and more. We are fully in support of the WELPUT proposal and give our full endorsement to this initiative. It will be of benefit to many charities, cultural and community focused organisations, and it will also help to bring the community and a liveliness back to the city.

With kind regards,

Jeorge Asare-Djan

Creative Director of The Black Secret



From: Tasnoglou , Anna
To: [redacted]
Subject: FW: 24/00021/ FULEIA
Date: 13 September 2024 16:03:17

Hi Shapi,

Can the following response please be uploaded on the file of the application?

Thank you,

Anna

Anna Tasnoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tasnoglou@cityoflondon.gov.uk | https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7Cpaburystreet%40cityoflondon.gov.uk%7C91caedd3ee64416cc59308dcd3f46ce9%7C9e65fcdb3cd4056851932221fe80ef8%7C0%7C0%7C638618293962926241%7CUnknown%7CTWFpbGZsb3dfeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=TiNBZ6SSbXWHSpqtQ3BGT6aCfGPoUL hM0Ehgc PIYJQ4%3D&reserved=0

Katie Stewart – Executive Director Environment

-----Original Message-----
From: Ralph Hood [redacted]
Sent: Friday, September 13, 2024 2:01 PM
To: Tasnoglou, Anna <Anna.Tasnoglou@cityoflondon.gov.uk>
Subject: 24/00021/ FULEIA

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

THIS IS AN EXTERNAL EMAIL

Dear Planning Department,

I am writing in support of the planning application for the future of Bury Street. The proposed repairs and opening up of the historic Holland House for a number of uses will help support a huge range of charities and community groups who do not have access to affordable workspace in the City.

My postcode is: E1 7EF

Letter of Support

20th September 2024

To whom it may concern,

Re Planning Application 24/00021/FULEIA

Club Together is a small, independent community interest company (CIC) supporting independent artists across London by providing essential training and development skills; as well as running community programmes and events.

After losing our venue in Newham due to rent increases, access issues and ever reducing creative funding from local authorities we have been working remotely to deliver our charitable work, but have faced organisational difficulties in doing this. Specifically, the lack of available, affordable space to rent for workshops, events and office space. As noted by the applicant, the proposed development includes a range of uses that align both with the Local Plan, and importantly for us, with our needs and those of the community and creative groups we work with.

Holland House has offered us a space free of charge to operate which, as a completely self-funded social enterprise, is invaluable for our business model and financial situation. This challenge is not only faced by us. A study by the Foundation for Future London found that 46 community spaces in London were permanently closed between 2018 and 2023, which is almost 10 per year. Meanwhile, the Greater London Authority notes that Between 2018 and 2022, London lost 2% of its cultural spaces. The situation in relation to music is especially dire; London lost 35% of its vital grassroots music venues from 2007. In response, the Mayor of London set up the Music Venues Taskforce to work out why so many music venues had closed and what impact this was having on London's culture and economy. Similarly, More than half of London's LGBTQ+ venues closed between 2006 and 2022, Greater London Authority data shows. Numbers fell from 125 to 50, with venues citing the cost-of-living crisis and rising rents as being among the reasons for closing.

Whilst the site is not directly within the Culture Mile BID, the close relationship between the development site, Culture Mile and other local culture landmarks such as Wilton's Music Hall means that this development presents a significant opportunity to enhance the creative and cultural economy of the City of London in a way that is sustainable and accessible for the grassroots and not just the large scale existing organisations such as the Barbican. As identified by the authority in the report Culture & Commerce: Fuelling Creative Renewal "the creative sector has enormous potential to play

a critical role in London's recovery" and we as Club Together CIC want to be a part of that through participating in this development, specifically the Holland House Hub as a "qualifying user". The Taskforce states that your "vision is for culture and commerce to work together to ensure London's creative energy and competitive strengths retain its position as the best city in the world in which to live, work, learn and invest."

We agree and are excited that "the Proposed Development represents a high-quality architectural response to the surrounding context… delivering new office floorspace alongside a mix of public, community, education, cultural, amenity and retail spaces" (1.7).

We have been impressed with the *long-term* community engagement plans and believe they have delivered on the CoL's Developer Engagement Guidelines and Statement of Community Involvement to the highest level.

Our experience and ambition alongside the developments proposed uses and activities presents an exciting opportunity to deliver against the City of London's 'Destination City' vision which "seeks to enhance the Square Mile's leisure offer to increase its appeal to existing and new audiences by creating a fun, inclusive, innovative and sustainable ecosystem." The impact and potential of this development to deliver against this ambition is vast and we want to display the sincerest thanks to Leila and the team behind this development project for their interest, support and generosity for our organisation. We wholeheartedly support the application and are excited to see it come to life.

Yours faithfully,





Emma King, Executive Producer

Cimeon Ellerton-Kay, Executive Chair

For Consideration by the City of London Planning Authority

Environment DepartmentCity of London PO Box 270, Guildhall, London EC2P 2EJ

By Email

20th September 2024

To whom it may concern,

Re: Planning Application 24/00021/FULEIA (WELPUT: Holland House)

Citizens of the World (COTW) is the UK's leading refugee choir. Notable gigs include the BAFTA award-winning Platinum Party at the Palace for Her Majesty's Jubilee in 2022, seen on BBC One by 13 million people, and the Pyramid Stage at Glastonbury festival, where we performed with Elbow in front of 100,000 people.

More than this, it is a community of people seeking sanctuary and local community. A 60-strong non-auditioned choir for refugees and their allies representing over 30 nations; we advocate for understanding, dignity and kindness through the transformative impact of music and song. We create and perform vibrant and joyful music that breaks down community barriers, reduces prejudice and increases well being through social connection, singing instruction, and public performances.

We agree and are excited that "the Proposed Development represents a high-quality architectural response to the surrounding context… delivering new office floorspace alongside a mix of public, community, education, cultural, amenity and retail spaces" (1.7). We have been impressed with the long-term community engagement plans and believe they have delivered on the CoL's Developer Engagement Guidelines and Statement of Community Involvement to the highest level.

Historically, people experiencing displacement have very little opportunity to access the arts, and the choir fills a much-needed gap in breaking down barriers to the benefits of arts participation. Citizens of the World started in 2017 as a short-term project run by musicians and grassroots volunteers donating their time. The work proved so needed and successful that we continued, evolving to become a professional nonprofit, now in our 8th year.

Accordingly, we are delighted to support the Planning Application 24/00021/FULEIA. Holland House has provided much needed space free of charge which, as a completely self-funded nonprofit, is invaluable for ensuring our resources go to supporting our community and not hiring space. This challenge is not only faced by us. A study by the Foundation for Future London found that 46 community spaces in London were permanently closed between 2018 and 2023, which is almost 10 per year. Meanwhile, the Greater London Authority notes that Between 2018 and 2022, London lost 2% of its cultural spaces.

Our organisation has a huge direct effect on our members: combating isolation, providing a support network, offering creative opportunities, addressing digital inequality (providing data

Cntd. →

and devices) and so much more. We have an award-winning, experienced and well-established team across musical, operations and well-being management positions; and we facilitate paid roles for a number of our refugee members. Responding to member needs, we offer a community run swap shop, provide healthy food at rehearsals and cover access costs (including travel for all refugee members). We use our performances to extend our impact and message beyond the boundaries of our community space, to play our part in educating the wider public and balancing the portrayal of people seeking sanctuary.

Our experience and ambition alongside the developments proposed uses and activities presents an exciting opportunity to deliver against the City of London's 'Destination City' vision which "seeks to enhance the Square Mile's leisure offer to increase its appeal to existing and new audiences by creating a fun, inclusive, innovative and sustainable ecosystem." The impact and potential of this development to deliver against this ambition, with COTW and other community and cultural groups as partners is vast, and we want to display the sincerest thanks to Leila and the team behind this development project for their interest, support and generosity for our organisation. We wholeheartedly support the project and are excited to see it come to life.

Yours faithfully,

[redacted]

Becky Dell FRSA, Musical Director, COTW Choir

MUSICAL DIRECTOR, Becky Dell
becky@cotwchoir.com

PATRONS: Lord Roger Roberts of Llandudno | Emily Watson OBE | Gulwali Passarlay | Ian Shaw | Ann Mitchell

FIND OUT MORE;
www.citizensoftheworldchoir.org

COMPANY NO; 12116848
TRADING ADDRESS; Room 22, Mycenae House, 90 Mycenae Road, SE3 7SE
REGISTERED ADDRESS: 194 Stanley Road, Twickenham, London, TW11 8UE

From: Linda Baharier
To: lpaburystreet
Cc: Daniel Baharier; michal baharier; Michelle Baharier
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 08 October 2024 11:38:00
Attachments: Bury Street Re-Consultation Letter.pdf

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

As previously with the previous application this is a to big a development ie 43 storeys in this area and
will totally destroy the light for Bevis Marks Synagoge . As the only continuous Synagoge in the UK
and Europe for over 350 years this is discusting that it is even being considered again.
To be honest the planning is almost anti semitic in nature with its disregard of the history and future
of the Sephardic community in such a historic building. My own family connections to the build date back
to 1741 or even earlier and I am horrified by these plans to destroy the ambiance and proper use of a
place of worship.
Would this even be considered if it was St. Paul's or Westminster Abbey?

Linda Baharier

On Tuesday 8 October 2024 at 11:26:21 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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From: Jonathan Goldsmith
To: lpaburystreet
Subject: Bevis Marks Synagogue
Date: 08 October 2024 12:03:23

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

I feel the development and how it encroaches on the Bevis Marks Synagogue and the surrounding conservation area is highly inappropriate.
Synagogues must have a view of natural light and at least partial view of the open sky. This new development will block both and basically destroy the synagogue's ability to be used by the orthodox and ancient community of one of the oldest synagogues in the UK set up to serve the Jews expelled by the Spanish Inquisition and invited to the UK by Oliver Cromwell in the 1640s!

I could not imagine for a minute that such a development would be allowed adjacent to the London Mosque in Regents Park or the Hindu Temple in Neasden, St Paul's Cathedral or Westminster Abbey.
Why next to one of the few Saphardi synagogues in the UK and also the oldest one ??
I suggest a real rethink, and a clever architect not wanting to erect yet another phallus on our skyline, could create a solution here that could provide the answer for the synagogue and the foreign investors paying little taxes in the UK and from countries that oppress the religion as well as other parts of UK life and human rights.

Jonathan Goldsmith
30 Spice Court
London
E1W 2JD

Sent from my Galaxy

From:	Peter Rose
To:	lpaburystreet
Subject:	31-34 Bury Street EC3A 5AR [for24/00021/FULEIA]
Date:	08 October 2024 13:06:48

[You don't often get email from [redacted]Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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>
> I object to this application.
>
> It would form another large complex in an immediate area which is already overdeveloped.
> This increases pollution,congestion and overloads utilities in the area. We have already suffered from power cuts.
>
> If permitted the construction period would increase local noise levels. Please strictly enforce limits on working hours.
> Some projects have been permitted 24 hour working which has caused us significant noise problems at night.
>
> I believe that this project is likely to impact the Bevis Marks Synagogue.
>
>
> Kind regards
> Peter Rose
Jamaica Buildings,St Michael’s Alley
London EC3V 9DS

From:	Edwin Green
To:	lpaburystreet
Subject:	Bury Street redevelopment.
Date:	08 October 2024 13:14:49

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THIS IS AN EXTERNAL EMAIL

Thank you for sending the revised application to which I object.

Edwin Green

Sent from my iPad

From: Adele Frost
To: lpaburystreet
Subject: Planning Department/Anna Tastsoglou
Date: 08 October 2024 19:24:17

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THIS IS AN EXTERNAL EMAIL

Dear Anna,
I wish to have it known that I object to this proposed building plan on the grounds that it will cause issues with light obstruction around the Bevis Marks Synagogue. This grade one listed building has been there since the 17th Century and relies on good natural light, so deserves to have the necessary facilities that it's age requires. The high building changes that continue to be applied for in this vicinity can never be acceptable as they will always be detrimental to the operation of this religious sacred establishment.
I hope you will consider mine and many others objections on similar grounds.
Yours Sincerely
Adele Frost
Sent from Outlook for Android

From: david@sephardicgenealogy.com
To: lpaburystreet; Pln - CC - Development Dc
Subject: Objection to Applications 24/00021/FULEIA and 24/00011/LBC
Date: 09 October 2024 12:38:50

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THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

Your References: 24/00021/FULEIA and 24/00011/LBC

I have received your letter regarding the proposed skyscraper above Bevis Marks synagogue, a Grade 1 protected building in the Creechurch Conservation Area. This is yet another attempt to disregard the wishes of those who regularly use the area. Bevis Marks is the most historically significant site of Jewish worship in the country, and one would not dare to treat an equivalent site of the Established Religion, such as St. Paul's Cathedral, with such disrespect.

Your recent correspondence was written in impenetrable English, making it difficult to understand. It is particularly concerning that a dyslexic friend required assistance for clarity, and I could only comprehend it after utilising artificial intelligence software.

The letter is dated 8th October, giving just one month for responses. You must be aware that this coincides with the Jewish High Holidays and the subsequent festival of Sukkot. This timing unfairly limits the ability of those most affected by the project to respond.

If this has been an oversight, I request that you:

1. Send a revised letter in plain English that can be understood by the general public. Your Equality and Inclusion team may assist in this effort.

2. Extend the deadline for responses to 7th December 2024. It is unethical and potentially discriminatory to require feedback from the Jewish community when they are least able to engage.

Please ensure this email is forwarded to:

- Bob Roberts, Interim Executive Director Environment
- Your complaints department
- Your Equality and Inclusion team

I expect to hear from each of them, as well as from you.

Yours sincerely,

David Mendoza

From: Can Amado
To: PLN - Admin
Subject: Re: Re Consultation - Bury Street Planning Application
Date: 09 October 2024 12:07:32

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

THIS IS AN EXTERNAL EMAIL

Dear Madam,

My objection stands. A 43 storey building that towers over Bevis Marks is a disgrace and should not be allowed. Imagine such a building was planned in such proximity of St Paul's Cathedral, there would be public outrage and the application would have been rejected.

It would be a show of great disrespect and contempt by the City of London to the Jewish community in Britain if the application is allowed.

I hope you are open minded and respectful enough to understand and consider the sensitivity of this to the Jewish community in Britain.

Can Amado

On Tue, Oct 8, 2024 at 11:26 AM lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
>
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
>
>
> Kind regards,
>
>
>
> Planning Administration Team
>

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From: Kathleen Parsons
To: lpaburystreet
Subject: Fwd: Re-Consultation - Bury Street Planning Application
Date: 09 October 2024 13:21:32
Attachments: Bury Street Re-Consultation Letter.pdf

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THIS IS AN EXTERNAL EMAIL

Dear Planning Administration Team,

For the average reader, this re-consultation is written in impenetrable English. So, a friend fed the entire document into ChatGPT.

Essentially, the **demolition** of ***grade-listed*** Bury House ***plus*** a *4-storey extension* of Holland House is simply another attempt to overshadow the relatively small footprint of Bevis Marks Synagogue as an important faith and cultural beacon to multiple generations of European exiles that continue to worship today as a living congregation.

Why do I get the idea that this singular example of a historic Sephardic building is being targeted? Surely the Mayor of London would object to this, since he has pledged impartiality to all faith groups! I doubt that an equivalent of, for example, an Oxo Tower would be built adjacent to the Regent Park Mosque, yet it seems to be encouraged for Bevis Marks Synagogue. There are so many other disused places of worship that could be used for profit, and my faith in democracy is finally shattered.

I **object** to this re-consultation for the above reasons.

Regards,

Kathleen Parsons

---------- Forwarded message ---------
From: **lpaburystreet** <lpaburystreet@cityoflondon.gov.uk>
Date: Tue, Oct 8, 2024 at 5:26 AM
Subject: Re-Consultation - Bury Street Planning Application
To:
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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From: [redacted]
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 10 October 2024 13:57:59

THIS IS AN EXTERNAL EMAIL

Dear Anna

I have received your email in relation to Bury Street, I have carefully studied the submission of additional information and revised drawings and I subsequently took the opportunity of again visiting the site in relation to the proposed alterations. Having once again given careful consideration to the altered proposals I remain strongly opposed to the the development of this site with the multi storey building as proposed for the reasons I have previously given.

Yours Sincerely
Antony Eskenzi DSc CBE FRICS

On Tuesday 8 October 2024 at 11:26:33 BST, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
>
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From: Judy Jackson
To: lpaburystreet
Subject: Bury Street Planning application
Date: 13 October 2024 17:53:02

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THIS IS AN EXTERNAL EMAIL

This is to register my total opposition to demolishing and rebuilding this vast structure within a very short distance of a vitally important synagogue: Bevis Marks, which has a long and important history in this country.

I am sure you will get a large number of communications supporting my thought that it is entirely inappropriate to erect such a large building in this small and treasured space.

from
Judy Jackson

YouTube/Food blog/Website

From: Lindsay Wakeman
To: lpaburystreet
Subject: ref. 24/00021/FULEIA and ref. 24/00011/LBC
Date: 14 October 2024 15:52:02

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THIS IS AN EXTERNAL EMAIL

Regarding:
Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

I wish to re-iterate my objection to the above planning applications. My reasons are as follows:

1. The planned developments will seriously adversely affect the Bevis Marks Synagogue in terms of both its existing setting, and its supply of natural daylight.
2. Possible further adverse effects and damage to the foundations of the Synagogue and the fabric of its structure.
3. The Synagogue is a Grade I listed building of national significance, the oldest in the UK, and has been for over 300 years continuously a working building and centre of Jewish faith and for these reasons should not be subjected to any potential damage or detrimental changes to its surrounding, daylight supply, and outlook.
4. The proposed developments are of an entirely different scale and design, will not be in any way in sympathy with the ancient Synagogue, and will dwarf and forever change its setting.
5. The London Plan contains policies that state that tall and very large buildings must not adversely affect the surroundings of, or overshadow, existing buildings.

Yours sincerely,

Lindsay Wakeman
London, N5 1SD

From: Eleanor Platt KC
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 14 October 2024 19:07:03

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THIS IS AN EXTERNAL EMAIL

Still very concerned as to the effect upon the oldest Synagogue in UK of this application. Light, overlook, etc.
Eleanor Lind

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 08 October 2024 11:26
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re-Consultation - Bury Street Planning Application

External Message

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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Eleanor Platt KC | Barrister

View Profile

1GC | Family Law CELEBRATING 35 years

Tel: 020 7797 7900
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DX: 1034 Chancery Lane

10 Lincoln's Inn Fields
London WC2A 3BP
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PO Box 51
Harleston
IP20 9YY72

Anna Tastsoglou
Department of the Built Environment
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

10 October 2024

Dear Ms Tastsoglou,

Planning Application at 1-4, 31 And 33-34 Bury Street, London, EC3A 5AR (the 'Site'): Response to comments from selected consultees on matters relating to effects on heritage significance in relation to the Proposed Development at the Site.

Introduction

1. This response has been prepared by KMHeritage on behalf of WELPUT in response to selected consultee representations made since submission of the full planning application under reference 24/00021/FULEIA for the

    a. "*Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.*"

And the associated Listed Building Consent application under reference 24/00011/LBC for the

b. "*Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works*".

2. The response seeks to provide high level commentary against key points on matters relating to effects on heritage significance of two buildings within the Site, namely Holland House (Grade II*) and Renown House (a non-designated heritage asset), made by the following four consultees: Historic England ('HE') in their letter dated 15 May 2024; Historic Buildings and Places ('HB&P') in their email dated 17th June 2024; The Twentieth Century Society ('TTCS') in their letter dated 17th May 2024 and The Victorian Society ('VS') in their letter dated 17th May 2024.

3. Comments made in relation to the impact of the Proposed Development on Townscape and Views have been addressed separately by The Townscape Consultancy and are not considered here.

Consultee comments with responses

4. This section groups the comments into the four main areas: Holland House: alteration to lightwell and party wall; Holland House: connection to Bury House; Holland House and Renown House: rooftop extension; and Renown House: general.

5. Responses may also refer to relevant paragraphs within the Heritage Statement dated December 2023 ('HS'), which accompanied the planning and Listed Building Consent applications.

Holland House: alterations to lightwell and party wall (with Renown House)

a. That altering the lightwell and demolishing party walls would be harmful through "*compromising the legibility of the historic design*". *(HE)*

b. "*The proposed extension would also have a harmful impact on building's the fabric and on the character of its interior spaces, namely through the infilling of its lightwell.*" *(TTCS)*

c. "*To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including [….],the enclosure of a light well. [..] the cumulative effect of these changes would heavily reduce the integrity of this heritage asset.*" *(VS)*

6. *Demolishing party walls:* the interconnection of Holland House and Renown House via removal of the party wall will create a new open plan space which will enable more productive use of the very limited usable floorplate that presently exists in Renown House (and which makes it difficult to Let) and will afford the joint endeavour new economically useful floorspace (**HS para. 5.42**). This intervention revisits and reinvents the original ambition of Helene Kröller-Müller to create one large building on the site (**HS, para. 2.22).** The fabric that it is proposed to remove to facilitate this is of low heritage significance in as far as it does not contribute significantly to the high architectural and aesthetic value for which Holland House has been listed at Grade II*. This would be a minor change to the floorplan in an area within Holland House that is not of high heritage significance (**HS, Appendix D**).

7. *Lightwell:* the lightwell is not pristine in terms of its fabric or proportions. It has seen extensive change as a result of the 1980s programme of alterations when it was partially infilled (eastern portion) with a new slab designed to increase the lettable area. There was also extensive demolition and reconstruction of the internal façade using masonry cladding with a glazed brick finish to replicate the original (**HS, para. 2.57**). It is a much underused and low quality space not least because it is open to the elements. Its proposed enclosure at 6th floor level will enhance the building's character and usefulness as a thriving high quality office space ('*optimum viable use*', NPPF para. 208) where lighting solutions are more than capable of replicating natural daylight conditions.

8. The '*fabric*' and '*character*' of the building's '*interior spaces*' are derived largely from the unique and high quality decorative internal spaces such as the original main entrance, basement and first floors lobbies and surviving boardrooms (**HS, Appendix D**). The space created by the lightwell, a common feature in buildings of this size and period, is secondary to these in terms of its contribution to fabric and character.

9. In more general terms, the '*legibility*' of the building's '*historic design*', as an intact whole, has already been compromised by the 1960s and 1980s interventions –including removing a not insubstantial amount of fabric from the east elevation in order to join it to the newly constructed Bury House. The Proposed Development positively seeks to improve upon those unsympathetic changes and enhance the character and appearance of the listed building and its neighbour.

Holland House: connection with Bury House

   a. *"[…] the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest." (HB&P)*

   b. *"The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the Proposed Development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and we are concerned*

that even more fabric would be removed as part of the current application. We are also concerned about the proposed insertion of a large stair to connect the ground and first floor levels and its impact on the interiors. We have concerns about the cumulative impact of previous and proposed changes on the significance of this Grade II listed building." (TTCS)*

c. "*To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building's fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset." (VS)*

10. This interconnection will be made at the existing point where the two buildings meet. This will affect only that part of the building which has already been compromised by the joining of Bury House to Holland House in the 1960s which resulted in the loss of much of the back wall of Holland House. This intervention will have the benefit of providing Holland House with DDA compliant lifts, essential firefighting cores and improved circulation without impacting upon fresh areas of structure or fabric or affecting fabric of high heritage significance. This will allow Holland House to become fit for the future and function in its '*optimum viable use*' (NPPF para. 208). Improvements to rectify past fabric loss and restore elements of the building's integrity, will include the restoration of the exposed part of eastern facade to the historic condition of glazed brick facing and the reinstatement of the lost Crittall fenestration (**HS para. 5.18, 5.33-34, 5.47**).

Holland House / Renown House: rooftop extension

a. *"The addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing." (HE)*

b. *"The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height" (HE)*

c. "*HB&P objects to the proposed four-storey extension to both Holland House and Renown House. It is an intrusive, bulky, and top-heavy addition to both buildings that fails to respect their proportions and scale. The extension would result in the loss of historic fabric, particularly within Holland House at roof level and the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest." (HB&P)*

d. "*that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The building's additional*

storeys would add considerable heaviness and bulkiness to the roofline. This building's extension would change the proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant's HTVIA views 42, 43 and 60." (TTCS)

e. "*The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the complete removal of the top floor of Holland House, causing less than substantial harm." (VS)*

11. The design of the upwards extension to Holland House is covered in **HS, paras. 5.21-24**. The proposals for the rooftop extension seek to actively recognise, reference and support the architectural intent of the Listed building through its thoughtful design which seeks to reference the proportions of the openings and piers of the historic façade to successfully continue the verticality of the original design. Use of high-quality materials and complementary colouring will ensure that the new elements will not compete with the old. Plant will be removed completely.

12. The proposed extension will change the historic proportions of the building to a modest degree, however the sensitivity of its design ensures that it will remain subservient and respectful of the original so as not to appear incongruous or overbearing in longer views. Although there will be a minor change in massing, it is not considered that this change will be of a degree that will cause harm to the heritage significance of the building as expressed and embodied in its external appearance and will certainly have no effect upon the unique contribution made by the building's decorative interiors to its heritage significance. The fabric that will be removed is related to the 1960s rooftop extension and later alteration and is of low/no heritage significance (**HS, paras. 5.36-5.37**).

13. Renown House will be extended upwards by two storeys via an additional full floor above the cornice line and a sympathetic mansard extension to enable it to segue seamlessly with Holland House at its upper levels. The present rather prosaic and altered attic storey, overtopped with a lift overrun, will be removed and replaced with a modern mansard design which will differentiate the new addition from the more traditional style building below. This treatment allows Renown to remain separate and subservient to Holland House when seen from the street and will improve the massing relationship when seen in the context of the proposed roof extension to Holland House. The proposal preserves all that is interesting in the building's external expression via a thoughtful and appropriate design which enables it to contribute fully to the objectives for reinvigorating Holland House. The proposed roof extension has been carefully designed to respect the original design of Renown House and be supportive to the setting of Holland House. It is required in order to match the proposals for the roof extension to Holland House. In that context, the extension to Renown makes sense and would continue to make a supportive and positive contribution to Holland House (**HS, para. 5.20 & 5.22**).

Renown House: general

a. *'Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset.' (VS)*

14. The interconnection of Holland House and Renown House via removal of the party wall will create a new open plan space which will enable more productive use of the very limited usable floorplate that presently exists in Renown House (and which makes it difficult to Let) and will afford the joint endeavour new economically useful floorspace (**HS para. 5.19**).

15. Renown House retains a modest amount of heritage significance as a characterful survival of a small-scale early 20th-century office building. The essence of this character will not change under the proposals –it will still be read as such from the street –however the proposals will enable the building to continue to positively contribute to the City via interventions which will allow to become economically viable; something which it currently is not. The modest change to the building's massing is entirely appropriate and proportionate to its low level of heritage significance. Its ability to make a positive contribution to the townscape will not change or be harmed (**HS, para. 5.41-5.42**).

Summary

16. This letter has sought to provide high level commentary against the points raised from four key consultees on the effect of the Proposed Development on matters relating to the heritage significance of Holland House (Grade II*) and Renown House (a non-designated heritage asset). This shows that all of the points raised by these consultees were considered and addressed within the Heritage Statement (as well as other documentation) submitted as part of the planning and Listed Building Consent applications that were validated on 11 March 2024. We therefore consider that the application material is sufficient for the City of London to proceed with the determination of the application.

Yours sincerely

Anne

Anne Roache MA MSc
Director
direct: [redacted]
[redacted]
www.kmheritage.com

From:	Amy Salter
To:	lpaburystreet
Cc:	Tastsoglou, Anna
Subject:	RE: Re-Consultation - Bury Street Planning Application
Date:	15 October 2024 14:53:38

THIS IS AN EXTERNAL EMAIL

Hi

I am very concerned about how this would block the light for Bevis Marks Synagogue and hope that you are aware how detrimental that this would be
I object on these grounds

Kind Regards

Amy Salter APFS Cert CII (MP&ER)

Chartered Financial Planner

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Tel [redacted]

Aspire House
17 Station Road
Finchley
London N3 2SB

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 15 October 2024 14:52
To: Amy Salter [redacted]
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: RE: Re-Consultation - Bury Street Planning Application

Dear contributor,

Thank you for your email.

Please note that you have been re-notified on this application due to the submission of a representation regarding the proposed development at Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (application references: 24/00021/FULEIA and 24/00011/LBC).

You are not required to make another representation, albeit you have been provided the opportunity to do so, given your previous interest regarding the proposed development.

If you wish for your details to be removed from our list of contributors, please let us know and the planning authority will not notify you again for any development at this site.

Kind Regards

Shupi Begum

Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Amy Salter [redacted]
Sent: 08 October 2024 12:13
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: RE: Re-Consultation - Bury Street Planning Application

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THIS IS AN EXTERNAL EMAIL

I think that this has been sent incorrectly to me.
I have no connection to this area

Kind Regards

Amy Salter APFS Cert CII (MP&ER)

Chartered Financial Planner

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Tel [redacted]

Aspire House
17 Station Road
Finchley
London N3 2SB

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 08 October 2024 11:26
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re-Consultation - Bury Street Planning Application

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team
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Website: http://www.cityoflondon.gov.uk

From: david@sephardicgenealogy.com
To: lpaburystreet
Subject: Failure to Follow Legal Obligations Regarding Re-Consultation
Date: 15 October 2024 15:06:12

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

Our Society's email of 9 October 2024 raised concerns over the Bury Street re-consultation. Despite this, you have failed to properly address the specific issues highlighted under:

1. **The Town and Country Planning Act 1990**
2. **The National Planning Policy Framework**
3. **The Planning and Compulsory Purchase Act 2004**
4. **The Equality Act 2010**

The following remain unresolved:

- **Incomprehensible Language**: Your letter of 8 October 2024 was impossible to decipher. We have since heard from qualified lawyers, none of whom could understand the text. This is unacceptable for official communication, and we now expect a letter in clear, plain English.

- **Consultation During Religious Holidays**: Issuing a consultation during the Jewish High Holidays and Sukkot was either negligent or a deliberate attempt to stifle response from the synagogue's users. This manipulation of process is a clear violation of the Equality Act 2010. An extension to 7 December 2024 is a minimal and reasonable request to correct this.

The Planning Department continues to consider applications that encroach on the Grade 1 listed Bevis Marks synagogue, yet no meaningful explanation has been provided to distinguish this re-application from those previously rejected. This calls your department's impartiality into question. The public perception that your department is collaborating with the developers is growing. This is compounded by the poor timing and impenetrable language of your communication.

We have received a holding response but no confirmation that our initial email was forwarded as requested to:

- Bob Roberts, Interim Executive Director Environment
- Your complaints department
- Your Equality and Inclusion team

Failure to respond fully by 23 October 2024 will leave us no option but to refer the matter to the Local Government and Social Care Ombudsman.

Yours sincerely,

David Mendoza
Joint President, Sephardic Genealogical Society

From: [redacted]
Sent: 09 October 2024 12:39
To: 'lpaburystreet@cityoflondon.gov.uk' <lpaburystreet@cityoflondon.gov.uk>;
'plans@cityoflondon.gov.uk' <plans@cityoflondon.gov.uk>
Subject: Objection to Applications 24/00021/FULEIA and 24/00011/LBC

Dear Ms. Tastsoglou,

Your References: 24/00021/FULEIA and 24/00011/LBC

I have received your letter regarding the proposed skyscraper above Bevis Marks synagogue, a Grade 1 protected building in the Creechurch Conservation Area. This is yet another attempt to disregard the wishes of those who regularly use the area. Bevis Marks is the most historically significant site of Jewish worship in the country, and one would not dare to treat an equivalent site of the Established Religion, such as St. Paul's Cathedral, with such disrespect.

Your recent correspondence was written in impenetrable English, making it difficult to understand. It is particularly concerning that a dyslexic friend required assistance for clarity, and I could only comprehend it after utilising artificial intelligence software.

The letter is dated 8th October, giving just one month for responses. You must be aware that this coincides with the Jewish High Holidays and the subsequent festival of Sukkot. This timing unfairly limits the ability of those most affected by the project to respond.

If this has been an oversight, I request that you:

1. Send a revised letter in plain English that can be understood by the general public. Your Equality and Inclusion team may assist in this effort.

2. Extend the deadline for responses to 7th December 2024. It is unethical and potentially discriminatory to require feedback from the Jewish community when they are least able to engage.

Please ensure this email is forwarded to:

- Bob Roberts, Interim Executive Director Environment
- Your complaints department
- Your Equality and Inclusion team

I expect to hear from each of them, as well as from you.

Yours sincerely,

David Mendoza

From: Jonathan Burg
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: Re-Consultation - Bury Street Planning Application
Date: 15 October 2024 15:50:17

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear City of London Planning,

Having taken another look at the proposed elevation styles and the updated document including the DSO I do wish to reinforce my comments.

The proposal as revised is a truly gloomy picture, pushing the surrounding residences and the historic building at Bevis Marks entirely into shade to a profound degree.

In terms of the choice of materials, while the building provides matching masonry and plenty of glass, the reality is that windows and blinds can be closed to obstruct the passage of light through the building, if the needs of its occupants are prime in their own use of blinds. Therefore however much glass the building provides, there is zero guarantee of blinds being left up to allow light through to the adjacent buildings.

The plan should be revised significantly either to offer a clear notch or a design with permanent unobstructed light passage through to and from all sides, with no occlusion permitted, to avoid placing the adjacent residences and historic buildings and usage areas into quite such a poor position as proposed.

It's entirely unacceptable to read the degree of loss for Bevis Marks taking light below even 2 hours a day at one equinox.

Jonathan Burg
64 Sherrick Green Road
London NW10 1LD
[redacted]

On Tue, 15 Oct 2024 at 15:18, Jonathan Burg [redacted] wrote:

> My apologies, I've jogged my memory.
>
> This is the location adjoining Bevis Marks.
>
> And yes, I did make a representation and yes I will now need to look this over to see if I need to make another one ASAP.
>
> Please keep me on the comms list!
>
> Sorry for my poor memory initially - I didn't immediately associate the two locations together when I saw your email.
>
> And I really do appreciate being kept informed here, thanks ever so much for taking the care to do so.

Best regards
Jonathan

Yahoo Mail: Search, organise, conquer

On Tue, 15 Oct 2024 at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear contributor,

Thank you for your email.

Please note that you have been re-notified on this application due to the submission of a representation regarding the proposed development at Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (application references: 24/00021/FULEIA and 24/00011/LBC).

You are not required to make another representation, albeit you have been provided the opportunity to do so, given your previous interest regarding the proposed development.

If you wish for your details to be removed from our list of contributors, please let us know and the planning authority will not notify you again for any development at this site.

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Jonathan Burg [redacted]
Sent: 08 October 2024 12:17
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re: Re-Consultation - Bury Street Planning Application

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THIS IS AN EXTERNAL EMAIL

How did you get my email address? I have no direct contact with the City and don't live there.

Yahoo Mail: Search, organise, conquer

On Tue, 8 Oct 2024 at 11:26, lpaburystreet

<lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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From: Jonathan Solomons
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 15 October 2024 16:42:40

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

This email was received but despite my best efforts, I am unable to understand its contents.

The fact that it was received during the Jewish High Holidays has significantly limited the time that I have had to seek clarity and respond appropriately. I assume that this is just an unfortunate oversight but would request that you extend the consultation period to enable those most affected by these proposals to meaningfully respond.

Should this not be agreed, I wish to place on record my ongoing and increasing opposition to these most egregious proposals, due to the negative and likely disastrous impact on Bevis Marks Synagogue.

Jonathan Solomons
Trustee, Bevis Marks Synagogue

On Tue, 8 Oct 2024 at 11:26, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
>
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--
Jonathan Solomons



From: Jo Denham
To: lpaburystreet
Cc: Jo Denham
Subject: 24/00021/FULEIA (planning permission), 24/00011/LBC (listed building consent)
Date: 25 October 2024 17:23:53

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Hello,

with reference to the letter dated 8 October 2024 re the above planning permission applications for Bury Street.

I reiterate my comments made on 23 April 2024 objecting to these applications: negative impact on surrounding area, particularly Bevis Marks (Grade 1 listed building), the Tower of London (World Heritage Site) and the Creechurch Conservation Area.

I urge that the plans are rejected in full.

JF DENHAM

14 Cambridge Court

220 Cambridge Heath Road

Bethnal Green

E2 9NW

From: Can Amado
To: [redacted]
Subject: Re: Re: Ref: 24/00181/FULL - Bury Street Planning Application
Date: 29 October 2024 14:56:01

[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

THIS IS AN EXTERNAL EMAIL.

Dear Madam,

My objection stands. A 43 storey building that towers over Bevis Marks is a disgrace and should not be allowed. Imagine such a building was planned in such proximity of St Paul's Cathedral, there would be public outrage and the application would have been rejected.

It would be a show of great disrespect and contempt by the City of London to the Jewish community in Britain if the application is allowed.

I hope you are open minded and respectful enough to understand and consider the sensitivity of this to the Jewish community in Britain.

Can Amado

On Tue, Oct 29, 2024 at 2:52 PM lpburystreet <lpburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
>
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
>
>
> Kind regards,
>
>
>
> Planning Administration Team
>
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>
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From: Brendan Callaghan SJ
To: lpaburystreet
Subject: Bury Street re-consultation
Date: 31 October 2024 21:01:09

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Nothing that I can see in this latest resubmission responds adequately to the objections made to the previous versions, in particular in how Bevis Marks Synagogue would be directly affected and in how the views of the Tower of London would also be detrimentally affected.

I therefore remain opposed to permission being given for the construction of this building.

I note, further, that this latest resubmission is extremely difficult to make sense of, given the ways in which the documentation has been presented.

With best wishes

Revd Brendan Callaghan SJ

_____

Brendan Callaghan S J
S uperior of Corpus Chris ti J es uit Community
757 Chris tchurch Road
Bos combe
BOUR NE MOUTH B H7 6AN
Mobile/cell [& Whats App]: [redacted]
S kype: brendancs j

From: Charlotte Gauthier
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 31 October 2024 22:31:09

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Many thanks for this email. The revised drawings and other submissions do not mitigate the concerns previously raised - especially the concern of impinging on the light of the historic Bevis Marks Synagogue - and I continue to object in the strongest terms.

All the best,
Dr Charlotte Gauthier

On Tue, 29 Oct 2024 at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
>
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> Website: http://www.cityoflondon.gov.uk

From: Edward Teeger
To: lpaburystreet
Subject: references 24/00021/FULEIA (planning permission), 24/00011/LBC (listed building)
Date: 02 November 2024 12:52:39

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear City of London Planning Authority,
The proposals lister above would reduce views from and 'significantly affect the natural light' in Bevis Marks Synagogue, disrupting prayers and affecting the atmosphere inside.

The granting of permission to this proposal would therefore be a regrettable development with implications for rights of religious practice, precisely in the place where Jews first enjoyed these rights in England following the 17th century resettlement. This would be a tragic irony.'

The planned tower 'puts at risk the core purpose of the Bevis Marks Synagogue as a fully functioning place of Jewish worship'.

Yours faithfully
Edward Teeger

From: Lee Moreland
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 03 November 2024 15:02:47

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I am a supporter of this proposed development. It will bring much needed redevelopment to this area of the City (together with all the other proposed large scale developments)

I live on the SouthBank and work in the City. This part of the City Of London is like a shanty town, decrepit with non-descript buildings of little value.

Your faithfully,

Lee Moreland

On Tue, 29 Oct 2024 at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
>
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City Hindus Network is a not for profit limited by guarantee (co. no. 8092157)
Registered office at: 215-217 Victoria Park Road, Hackney, London E9 7HD

1 November 2024

Planning Officer
Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Dear Sir/Madam,

Re: Planning Application 24/00021/FULEIA (WELPUT: Holland House)

I am writing on behalf of the City Hindus Network (CHN), an organisation that serves as a platform for professionals within the Hindu community, fostering a sense of belonging and facilitating networking, cultural, and educational events across London. We are fully support the planning application that includes Holland House and believe the development will be a positive addition to the City of London.

A key reason for our support is the commitment made by the developers to provide free-of-charge community spaces within the current and future premises. As a not for profit, CHN has faced significant challenges in hosting events due to the limited availability of affordable venues in the city. The lack of access to cost-effective spaces has greatly restricted our ability to carry out more frequent events that serve the local community in the square mile and its professionals from various sectors.

The inclusion of community spaces at Holland House will directly address this issue, allowing us to expand our activities and engage more effectively with our members. This will not only benefit CHN but will also contribute to the cultural and social vibrancy of the City of London as a whole, promoting inclusivity and diversity.

We believe that the future Holland House will become an important hub for organisations like ours, providing us with a resource to further our mission to provide networking and professional development opportunities, as well as cultural and educational initiatives, at no additional cost to the community.

We trust that the City of London Corporation will recognise the significant community benefits this project offers and grant approval for the planning application.

Yours sincerely,

[redacted]

Dhruv Patel OBE
Founder & Director, City Hindus Network
07921 910 577
dhruvpatel@fastmail.co.uk

PO Box 51
Harleston
IP20 9YY72

Anna Tastsoglou
Department of the Built Environment
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

10 October 2024

Dear Ms Tastsoglou,

Planning Application at 1-4, 31 And 33-34 Bury Street, London, EC3A 5AR (the 'Site'): Response to comments from selected consultees on matters relating to effects on heritage significance in relation to the Proposed Development at the Site.

Introduction

1. This response has been prepared by KMHeritage on behalf of WELPUT in response to selected consultee representations made since submission of the full planning application under reference 24/00021/FULEIA for the

    a. "*Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.*"

And the associated Listed Building Consent application under reference 24/00011/LBC for the

b. "*Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works*".

2. The response seeks to provide high level commentary against key points on matters relating to effects on heritage significance of two buildings within the Site, namely Holland House (Grade II*) and Renown House (a non-designated heritage asset), made by the following four consultees: Historic England ('HE') in their letter dated 15 May 2024; Historic Buildings and Places ('HB&P') in their email dated 17th June 2024; The Twentieth Century Society ('TTCS') in their letter dated 17th May 2024 and The Victorian Society ('VS') in their letter dated 17th May 2024.

3. Comments made in relation to the impact of the Proposed Development on Townscape and Views have been addressed separately by The Townscape Consultancy and are not considered here.

Consultee comments with responses

4. This section groups the comments into the four main areas: Holland House: alteration to lightwell and party wall; Holland House: connection to Bury House; Holland House and Renown House: rooftop extension; and Renown House: general.

5. Responses may also refer to relevant paragraphs within the Heritage Statement dated December 2023 ('HS'), which accompanied the planning and Listed Building Consent applications.

Holland House: alterations to lightwell and party wall (with Renown House)

a. That altering the lightwell and demolishing party walls would be harmful through "*compromising the legibility of the historic design*". *(HE)*

b. "*The proposed extension would also have a harmful impact on building's the fabric and on the character of its interior spaces, namely through the infilling of its lightwell.*" *(TTCS)*

c. "*To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including [….],the enclosure of a light well. [..] the cumulative effect of these changes would heavily reduce the integrity of this heritage asset.*" *(VS)*

6. *Demolishing party walls:* the interconnection of Holland House and Renown House via removal of the party wall will create a new open plan space which will enable more productive use of the very limited usable floorplate that presently exists in Renown House (and which makes it difficult to Let) and will afford the joint endeavour new economically useful floorspace (**HS para. 5.42**). This intervention revisits and reinvents the original ambition of Helene Kröller-Müller to create one large building on the site (**HS, para. 2.22).** The fabric that it is proposed to remove to facilitate this is of low heritage significance in as far as it does not contribute significantly to the high architectural and aesthetic value for which Holland House has been listed at Grade II*. This would be a minor change to the floorplan in an area within Holland House that is not of high heritage significance (**HS, Appendix D**).

7. *Lightwell:* the lightwell is not pristine in terms of its fabric or proportions. It has seen extensive change as a result of the 1980s programme of alterations when it was partially infilled (eastern portion) with a new slab designed to increase the lettable area. There was also extensive demolition and reconstruction of the internal façade using masonry cladding with a glazed brick finish to replicate the original (**HS, para. 2.57**). It is a much underused and low quality space not least because it is open to the elements. Its proposed enclosure at 6th floor level will enhance the building's character and usefulness as a thriving high quality office space ('*optimum viable use*', NPPF para. 208) where lighting solutions are more than capable of replicating natural daylight conditions.

8. The '*fabric*' and '*character*' of the building's '*interior spaces*' are derived largely from the unique and high quality decorative internal spaces such as the original main entrance, basement and first floors lobbies and surviving boardrooms (**HS, Appendix D**). The space created by the lightwell, a common feature in buildings of this size and period, is secondary to these in terms of its contribution to fabric and character.

9. In more general terms, the '*legibility*' of the building's '*historic design*', as an intact whole, has already been compromised by the 1960s and 1980s interventions –including removing a not insubstantial amount of fabric from the east elevation in order to join it to the newly constructed Bury House. The Proposed Development positively seeks to improve upon those unsympathetic changes and enhance the character and appearance of the listed building and its neighbour.

Holland House: connection with Bury House

   a. *"[…] the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest." (HB&P)*

   b. *"The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the Proposed Development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and we are concerned*

that even more fabric would be removed as part of the current application. We are also concerned about the proposed insertion of a large stair to connect the ground and first floor levels and its impact on the interiors. We have concerns about the cumulative impact of previous and proposed changes on the significance of this Grade II listed building.“ (TTCS)*

c. “*To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building’s fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset.“ (VS)*

10. This interconnection will be made at the existing point where the two buildings meet. This will affect only that part of the building which has already been compromised by the joining of Bury House to Holland House in the 1960s which resulted in the loss of much of the back wall of Holland House. This intervention will have the benefit of providing Holland House with DDA compliant lifts, essential firefighting cores and improved circulation without impacting upon fresh areas of structure or fabric or affecting fabric of high heritage significance. This will allow Holland House to become fit for the future and function in its ‘*optimum viable use*’ (NPPF para. 208). Improvements to rectify past fabric loss and restore elements of the building’s integrity, will include the restoration of the exposed part of eastern facade to the historic condition of glazed brick facing and the reinstatement of the lost Crittall fenestration (**HS para. 5.18, 5.33-34, 5.47**).

Holland House / Renown House: rooftop extension

a. *"The addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing." (HE)*

b. *"The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height" (HE)*

c. “*HB&P objects to the proposed four-storey extension to both Holland House and Renown House. It is an intrusive, bulky, and top-heavy addition to both buildings that fails to respect their proportions and scale. The extension would result in the loss of historic fabric, particularly within Holland House at roof level and the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest.” (HB&P)*

d. “*that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The building’s additional*

storeys would add considerable heaviness and bulkiness to the roofline. This building's extension would change the proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant's HTVIA views 42, 43 and 60." (TTCS)

e. "*The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the complete removal of the top floor of Holland House, causing less than substantial harm." (VS)*

11. The design of the upwards extension to Holland House is covered in **HS, paras. 5.21-24**. The proposals for the rooftop extension seek to actively recognise, reference and support the architectural intent of the Listed building through its thoughtful design which seeks to reference the proportions of the openings and piers of the historic façade to successfully continue the verticality of the original design. Use of high-quality materials and complementary colouring will ensure that the new elements will not compete with the old. Plant will be removed completely.

12. The proposed extension will change the historic proportions of the building to a modest degree, however the sensitivity of its design ensures that it will remain subservient and respectful of the original so as not to appear incongruous or overbearing in longer views. Although there will be a minor change in massing, it is not considered that this change will be of a degree that will cause harm to the heritage significance of the building as expressed and embodied in its external appearance and will certainly have no effect upon the unique contribution made by the building's decorative interiors to its heritage significance. The fabric that will be removed is related to the 1960s rooftop extension and later alteration and is of low/no heritage significance (**HS, paras. 5.36-5.37**).

13. Renown House will be extended upwards by two storeys via an additional full floor above the cornice line and a sympathetic mansard extension to enable it to segue seamlessly with Holland House at its upper levels. The present rather prosaic and altered attic storey, overtopped with a lift overrun, will be removed and replaced with a modern mansard design which will differentiate the new addition from the more traditional style building below. This treatment allows Renown to remain separate and subservient to Holland House when seen from the street and will improve the massing relationship when seen in the context of the proposed roof extension to Holland House. The proposal preserves all that is interesting in the building's external expression via a thoughtful and appropriate design which enables it to contribute fully to the objectives for reinvigorating Holland House. The proposed roof extension has been carefully designed to respect the original design of Renown House and be supportive to the setting of Holland House. It is required in order to match the proposals for the roof extension to Holland House. In that context, the extension to Renown makes sense and would continue to make a supportive and positive contribution to Holland House (**HS, para. 5.20 & 5.22**).

Renown House: general

a. *'Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset.' (VS)*

14. The interconnection of Holland House and Renown House via removal of the party wall will create a new open plan space which will enable more productive use of the very limited usable floorplate that presently exists in Renown House (and which makes it difficult to Let) and will afford the joint endeavour new economically useful floorspace (**HS para. 5.19**).

15. Renown House retains a modest amount of heritage significance as a characterful survival of a small-scale early 20th-century office building. The essence of this character will not change under the proposals –it will still be read as such from the street –however the proposals will enable the building to continue to positively contribute to the City via interventions which will allow to become economically viable; something which it currently is not. The modest change to the building's massing is entirely appropriate and proportionate to its low level of heritage significance. Its ability to make a positive contribution to the townscape will not change or be harmed (**HS, para. 5.41-5.42**).

Summary

16. This letter has sought to provide high level commentary against the points raised from four key consultees on the effect of the Proposed Development on matters relating to the heritage significance of Holland House (Grade II*) and Renown House (a non-designated heritage asset). This shows that all of the points raised by these consultees were considered and addressed within the Heritage Statement (as well as other documentation) submitted as part of the planning and Listed Building Consent applications that were validated on 11 March 2024. We therefore consider that the application material is sufficient for the City of London to proceed with the determination of the application.

Yours sincerely

Anne

Anne Roache MA MSc
Director
direct: [redacted]
www.kmheritage.com

From:	Jonathan Burg
To:	Tastsoglou, Anna
Cc:	lpaburystreet
Subject:	Re: Re-Consultation - Bury Street Planning Application
Date:	06 November 2024 19:34:48
Attachments:	Outlook-v5xxet3v.png Outlook-Descriptio

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Thanks. As those don't relate to the lightfall around the building I won't comment further at this stage.

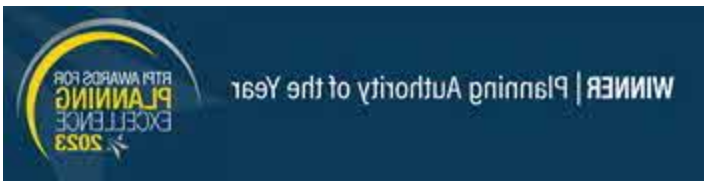
Best regards
Jonathan

[redacted]

On Wed, 6 Nov 2024 at 9:49, Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk> wrote:

> Dear Jonathan,
>
> Thank you for your email.
>
> I can confirm that this is the third round of consultations.
>
> Although there is no need for you to comment again, you have been given this opportunity, as some additional information has been submitted by the applicant. Some further details relating to the previously submitted Lunar Transit Study have been provided and also some minor changes to the internal layout changes to accommodate short stay cycle parking. Details of how provision will be made for a blue badge parking bay have also been submitted.
>
> I trust the above is of some assistance.
>
> Kind regards,
>
> Anna
>
> **Anna Tastsoglou | Principal Planning Officer (Development Management)**
>
> Environment Department | City of London | Guildhall | London EC2V 7HH
> 07751 731282
>
> anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment



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From: paul dimoldenberg
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 07 November 2024 12:12:03

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THIS IS AN EXTERNAL EMAIL

Dear City of London

I object to the proposals for a 43-storey tower at 31 Bury Street.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

I suggest the following reasons for refusal:

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block

this critical view which is important to the functioning of the Synagogue.

Please refuse this damaging and inappropriate planning application.

Thank you

Paul Dimoldenberg
44 Manor House
Marylebone Road
London NW1 5NP

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 29 October 2024 14:53
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re-Consultation - Bury Street Planning Application

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team
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From: charlotte green
To: lpaburystreet
Subject: Bevis Marks Synagogue
Date: 07 November 2024 14:48:05

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THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

I am writing to you to ask you not to go ahead with the proposed development because:

1. I really do think that it would cause a lot of hard with regard to our heritage, in terms of its impact on the Bevis Marks Synagogue and on its site. It would also impact adversely on the Creechurch Conservation Area and on other local heritage sites.
2. I don't know if you are aware tha light is very important indeed to t Bevis Marks Synagogue. Prayers and worship involve a great deal of reading of printed script s in Hebrew, and this proposal would definitely have a terrible and unacceptable impact of the level of daylight, - which we all need in the Synagogue.
3. The courtyard of the Synagogue would be overshadowed, and this is used for a range of Communal and Religious activities.
4. The view of the moon passing across the night sky is symbolic and intrinsically related to the rituals of the Synagogue. This proposal would block this critical view, which is important to the functioning of the Synagogue.
5. I am sure you are that Bevis Marks Synagogue is a very significant building, both within the City of London and nationally. You must know that it is a Grade 1 listed building, and dates back to 1701. It is the oldest and most important Synagogue historically, in London. It is very important to the Jewish Coimmunity and is of huge significance in a number of ways: from an architectural, an artistic, and a historical perspective. . .
6. The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
7. The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
8. The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
9. The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.
10. There was a similar application along the same lines before by the same applicant: ref. 20/00848/FULEIA. This was refused in 2022, because of the impact of the proposal on Bevis Mark Synagogue and its setting, and on the setting of the Tower of London. These reasons are of course still very important, and I hope you will agree with me, that the reasons for refusal in 2022 still apply today.

Please could you let me know of your decision when you have made it.

Many thanks

Charlotte Green
Freeman of the City of London and Member of the Worshipful Company of Spectacle Makers

From: joelbonnet@yahoo.co.uk
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 07 November 2024 15:45:53

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THIS IS AN EXTERNAL EMAIL

Good afternoon,

I am writing to object to this planning application.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. The Synagogue has recently gained the added status of being within a Conservation Area.

The reasons for refusal in 2022 apply today including that the proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting and the proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

Yours faithfully,

Joel Bonnet

From:	Judy Jackson
To:	lpaburystreet
Subject:	Bevis Marks synagogue
Date:	07 November 2024 15:57:15

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THIS IS AN EXTERNAL EMAIL

This is to register our strong objection to the planning application which will badly affect the historic oldest synagogue in UK. A 40 storey building will destroy the light going into the synagogue and courtyard. There are already enough towering buildings in the area. Please don’t allow this to happen.

Judy Jackson. (previously a Westminster magistrate for 20 years).
Sent from my iPhone

From: Laurent Sicsic
To: lpaburystreet
Subject: Objections to proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 07 November 2024 16:03:05

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THIS IS AN EXTERNAL EMAIL

Dear Madam, Dear Sir,

Please find the reasons why I strongly object to the planning application for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA), notwithstanding the additional information provided by the applicant.

-> This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

-> The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses. However, the design changes will make hardly any difference to the impact on the Synagogue.

-> Bevis Marks Synagogue has recently gained the added status of being within a Conservation Area. The changes made by the applicants would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause

-> Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

-> The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

-> The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

-> The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

-> The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the

Synagogue

Really hoping these objections will be taken into consideration and the planning application rejected.

Sincerely yours,

Laurent Sicsic
[redacted]

From: Ezra Timan
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application 24/00021/FULEIA and 24/00011/LBC
Date: 07 November 2024 16:22:37
Attachments: Bury Street Re-Consultation Letter.pdf

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THIS IS AN EXTERNAL EMAIL

Dear Ms Anna

I would like to reconfirm my objection to these applications. I stress the reasons for the objections:

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance. This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The 'public benefits' described by the developer, would confer little to no benefit upon the Synagogue and the community it supports, and whilst they may benefit some people, it would hardly begin to counter the damage the tower would cause.

I reiterate again my objection.

Regards

Ezra Timan

On 8 Oct 2024, at 11:26, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team
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Website: http://www.cityoflondon.gov.uk

From: Ruth Timan
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application 24/00021/FULEIA AND 24/00011/LBC
Date: 07 November 2024 16:36:01
Attachments: Bury Street Re-Consultation Letter.pdf

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THIS IS AN EXTERNAL EMAIL

Dear Ms Anna

I would like to reconfirm my objection to these applications.

- The proposed development would cause substantial harm in heritage terms to Bevis Marks Synagogue and to character and appearance of Creechurch Conservation area;;
- The synagogue is one of the most natural light sensitive in London and the development would cause unacceptable impact on internal daylight levels;
- Overshadowing in the synagogue court yard;
- A similar application by the same applicant was refused in 2022 for two reasons relating to the impact of the proposal on the setting of Tower of London and Bevis Marks Synagogue;

For such reasons and others, I object to granting planning permission.

Regards

Ruth

> On 8 Oct 2024, at 11:26, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
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facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From:	sophie obadiah
To:	lpaburystreet
Cc:	David Z Obadiah
Subject:	43 storey tower at 31 Bury Street ref. 24/00021/FULEIA
Date:	07 November 2024 16:37:03

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THIS IS AN EXTERNAL EMAIL

Dear Sir/ Madam,

I would like to object to the 43 storey tower proposal. Although I understand changes have been made to offer benefits to the community, I still feel that as a resident of our beautiful city of London, the proposed tower should not go ahead. It will overshadow a magnificent Grade 1 listed building- the Bevis Marks Synagogue and will cause substantial harm to the character and appearance of Creechurch Conservation Area.
However enticing it may be to have new towers be built, I do believe that we have a duty to the future generation to maintain some respect for listed properties in London.
Please do not allow this proposal to go ahead and instead allow the historic beauty of Grade 1 buildings to remain pride of place.

Thank you in advance for your consideration.

Yours faithfully,

Mrs Sophie Obadiah

From: Leslie Morgan
To: lpaburystreet
Subject: Objection to the proposal.
Date: 07 November 2024 19:10:04

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- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Additionally:

> Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

> This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Many thanks,

Leslie Morgan OBE DL

20 Woodstock Road

London NW11 8ER

From: [redacted]
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA) - OBJECTION
Date: 07 November 2024 20:31:17

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THIS IS AN EXTERNAL EMAIL

Dear Sirs,

Despite the recent submission of additional information and revised drawings by the promoters of the 43-storey building at 31 Bury Street, I again wish to object.

1. The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
2. The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
3. The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
4. The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Please be advised that Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represent public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Kindly take the above into account and refuse the application.

Thank you.

Yours faithfully,

From: David Zubaida
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 07 November 2024 21:59:52
Attachments: Bury Street - Re-Consultation Letter.docx

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THIS IS AN EXTERNAL EMAIL

Hello,

I strongly object to the proposed changes for the following reasons:

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.
- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.
- This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

Please take these objections under strong consideration.

Thanks,

David

> On 29 Oct 2024, at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team

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Website: http://www.cityoflondon.gov.uk<Bury Street - Re-Consultation Letter.docx>

From: Alan Mendoza
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 07 November 2024 23:48:42

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THIS IS AN EXTERNAL EMAIL

Dear Planning Committee,

I am writing to formally object to the proposed 43-storey tower development adjacent to Bevis Marks Synagogue in the City of London. This historic synagogue, constructed in 1701, holds both national and cultural significance as the oldest and one of the most historically important synagogues in the United Kingdom. As a Grade I Listed building, Bevis Marks is a unique symbol of communal, architectural, and historical heritage. I urge you to reject this application for the following reasons:

Firstly, this proposed development poses a severe threat to the heritage and historical significance of Bevis Marks Synagogue and its surrounding Creechurch Conservation Area. The tower would not only cause substantial harm to the synagogue's setting and appearance but also detrimentally impact the character of the conservation area itself. Additionally, this project would have a measurable negative effect on other valuable heritage assets in the area, albeit to a slightly lesser degree.

Furthermore, Bevis Marks Synagogue is exceptionally sensitive to natural light due to its architectural design and its role in worship, where natural light is critical for reading sacred texts. This development threatens to disrupt the internal daylight levels within the synagogue to an unacceptable degree. Such an impact would significantly hinder the daily practices and rituals essential to the building's religious and cultural function. Additionally, the proposed tower would cast extensive shadows over the synagogue's courtyard, an important space for community gatherings, celebrations, and religious observances. The loss of adequate sunlight in this area would fundamentally diminish the courtyard's usability, stripping away its warmth, openness, and purpose as a community space.

Another critical aspect of this objection concerns the synagogue's symbolic connection to the moon's passage across the night sky, an integral part of its rituals and traditions. The proposed development would obstruct this view, thereby erasing a fundamental aspect of Bevis Marks' spiritual and cultural experience. This loss would be irreversible, undermining traditions that are deeply meaningful to the community and have been observed for centuries.

It is also important to note that a similar application (ref. 20/00848/FULEIA) was previously submitted by the same applicant and was rightfully refused in 2022. The reasons cited in that decision –specifically, the adverse impacts on Bevis Marks Synagogue's setting and the Tower of London –remain fully applicable today. Despite claims of minor design modifications, the changes proposed do not adequately address the harm the

development would cause to the synagogue's environment and heritage. The recent designation of Bevis Marks within a Conservation Area only raises the heritage threshold, making this proposal even less appropriate.

The applicants argue that public benefits, such as offering spaces for community groups and small businesses, outweigh the detrimental impact on Bevis Marks. However, these so-called benefits provide little to no advantage to the synagogue itself or to the community it serves. Any marginal gains offered to others fail to justify the scale of harm inflicted upon a site of such historic and cultural importance.

In light of these issues, I strongly urge the committee to reject this application. The irreversible damage to one of the UK's most precious heritage assets is too high a cost for any perceived public benefit. Protecting Bevis Marks Synagogue is not only a duty to the City of London but also a responsibility to preserve our shared cultural and historical heritage for generations to come.

Thank you for your consideration.

Yours faithfully,

Dr Alan Mendoza
Millbank Tower
London
SW1P 4QP

From: David Shamash
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 08 November 2024 14:28:03

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THIS IS AN EXTERNAL EMAIL

The new proposals by the developers are not much more different than those proposed in 2022.
The proposed building will be and eye-sore to the surrounding area and would severely impact the light to the synagoge,
I strongly object to the proposals.

David Shamash
[redacted]

On Tuesday 29 October 2024 at 14:52:22 GMT, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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From: Vivien Baroukh
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 08 November 2024 23:59:46

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Please find my objections to the additional proposals to 31 Bury Street.

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

> This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

It is therefore my view that the synagogue would be negatively impacted

Vivien Baroukh

44 Circus Road NW8 9SE

Sent from my iPhone

From: Jonathan B
To: lpaburystreet
Subject: RE: Re-Consultation - Bury Street Planning Application
Date: 09 November 2024 13:54:56
Attachments: Bury Street - Re-Consultation Letter.docx

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THIS IS AN EXTERNAL EMAIL

Hello,

I'd like to reiterate my objection to this revised proposal.

Of primary concern to me is the Spanish & Portuguese Bevis Marks synagogue. Building a 43 storey tower in this location will block all sun and moonlight from the synagogue on which it is critically dependent. It is a grade 1 listed heritage site not only for the UK but the entire world. Natural light of critical not only because of the age of the historical building but also because many of the religious ceremonies that take place there relate to thanks and appreciation of it.

Unfortunately, even with the modifications that have been made to this application it continues to be entirely unacceptable.

Thank you for your support and understanding.

Jonathan Bilbul

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 29 October 2024 14:54
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re-Consultation - Bury Street Planning Application

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team
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agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From: Dorothy Lampert
To: lpaburystreet
Subject: FW: Re-Consultation - Bury Street Planning Application
Date: 10 November 2024 12:45:40
Importance: High

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THIS IS AN EXTERNAL EMAIL

Subject: Your reference: 24/00021/FULEIA and 24/00011/LBC

Dear Ms Tastsoglou

I am writing to strongly object to planning application 24/00021/FULEIA and listed building consent application 24/00011/LBC for the proposed developments at Bury House, 31-34 Bury Street and Holland House, 32 Bury Street, London EC3A 5AR/5AW.

My objections are based on the following grounds:

1. Severe Impact on Heritage Assets

The proposed 43-storey tower (178.7m AOD) and substantial alterations to Holland House would cause significant harm to multiple heritage assets:

a) Bevis Marks Synagogue (Grade I listed): Europe's oldest continuously used synagogue, dating from 1701. The 43-storey tower, in close proximity, would severely impact its setting and overshadow its courtyard, fundamentally altering the character of this internationally significant site.

b) Holland House (Grade II* listed): The proposed four-storey roof extension, partial demolition, and extensive alterations including removal and reinstatement of external faience would compromise the architectural integrity of this remarkable building. These works risk damaging its distinctive character and fabric.

c) St Katherine Cree Church and St Botolph's Church (both Grade I listed): These 17th and 18th-century churches would be adversely affected by the scale and massing of the proposed developments.

The National Planning Policy Framework (NPPF) paragraph 199 states that "great weight should be given to the asset's conservation". The harm caused to these assets is not outweighed by public benefits, contrary to NPPF paragraph 202.

2. Conflict with Conservation Area Designation

The site falls within the recently designated Creechurch Conservation Area (January 2024). The proposed 43-storey tower, at nine times the size of the existing building, and the substantial alterations to Holland House directly conflict with the City of London's planning policy, which states that tall buildings are

inappropriate within conservation areas.

3. Non-Compliance with Development Plan

The application explicitly states that it "does not accord with the provisions of the development plan in force in the area". This admission alone should be grounds for refusal, as it contradicts local planning policies designed to protect the character and heritage of the area.

4. Environmental Impact

As an EIA application, the environmental statement must be scrutinised carefully. The scale of the development is likely to have significant impacts on local microclimate, wind patterns, and daylight/sunlight levels, which could adversely affect the surrounding area and its historic buildings.

5. Cumulative Impact

These proposals, combined with other recent and proposed developments in the area, would result in an unacceptable cumulative impact on the character of the historic City of London, particularly its low-rise areas of heritage significance.

6. Inappropriate Alterations to Holland House

The proposed alterations to Holland House, including the four-storey roof extension, partial demolition, and extensive internal changes, would significantly harm the architectural and historical integrity of this Grade II* listed building. The removal and reinstatement of external faience and the replacement of the existing concrete beam pose considerable risks to the building's fabric and character.

Conclusion

In light of these significant concerns, I urge the planning committee to reject both applications. The proposed developments would cause substantial harm to multiple heritage assets, contravene local and national planning policies, and fundamentally alter the character of this historically sensitive area of London.

The City of London has a duty to protect its unique historical fabric. Approving these applications would set a dangerous precedent for future development in conservation areas and around listed buildings of national and international importance.

Yours sincerely,

Dorothy Lampert (Mrs)

From:	Yahoo
To:	lpaburystreet
Subject:	Bury street planning Application
Date:	11 November 2024 13:29:01

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THIS IS AN EXTERNAL EMAIL

Dear Sirs

I would like to strongly object to the new proposed planning application on the following grounds:

1-the proposed development will overshadow Bevis Marks synagogue and cause substantial harm to its significance, character and appearance.

2-natural light is essential to reading of printed scripts which in turn is fundamental to worship. The proposal would have unacceptable impact on internal daylights levels.

3-the proposed development will cause an unacceptable level of overshadowing of the courtyard where community and religious uses take place.

4-the passage of the moon across the night sky is highly symbolic to the tradition and rituals of the Synagogue.

Your sincerely

Freddy Salem

From: Ben Yudkin
To: lpaburystreet
Subject: Planning application 24/00021/FULEIA
Date: 11 November 2024 14:28:15

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)

I wish to comment on the above application. My *locus standi* is that I am a member of the congregation at Bevis Marks Synagogue, a Grade I listed building affected by the proposal.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance. It is now also within a Conservation Area.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022. Nothing in the amended proposal mitigates the reasons for refusal on that occasion and it would therefore be perverse to reverse the refusal.

The proposed development would cause significant damage to the functioning of this exceptional heritage asset, which would not be mitigated in any way by the proposal to create communal space in the area of the development. In particular:

- The proposed development would cause substantial harm to the character and appearance of the Creechurch Conservation Area and grave damage in heritage terms to the significance of Bevis Marks Synagogue and its setting.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels. Daylight is not merely an optional extra, it is fundamental to the functioning of the synagogue.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses. Particularly in view of the security needs of the Jewish Community, it would be entirely unrealistic to relocate these to another venue. The courtyard is a fundamental part of the whole way that this unique heritage asset functions.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

It is evident that the changes made since the previous (rejected) proposal do nothing to alleviate these fundamental objections. The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits. Whether or not this is true, it does not address the problems caused to Bevis Marks in particular, which was one of the main factors in the decision to refuse the earlier application. Moreover, given that Bevis Marks is now within

a Conservation Area, the bar to development that will damage it is even higher than before, and the legal requirement to preserve heritage assets is even greater.

Yours faithfully

(Dr) Ben Yudkin

From: Howard Bogod
To: lpaburystreet
Subject: RE: Re-Consultation - Bury Street Planning Application
Date: 11 November 2024 18:37:00

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THIS IS AN EXTERNAL EMAIL

Dear Sirs

My objection still stands as the changes proposed by the developed in no measurable way diminish the negative impact of the proposed development on Bevis Marks synagogue. The application is basically the same as the one (ref. 20/00848/FULEIA) which was rejected 2 years ago because of its impact on Bevis Marks and now that the synagogue is in a conservation area for an application to be accepted the impact needs to be less. Indeed it is impossible to see how a 43 story tower cannot have a negative impact so close to a 3 story 17th century Grade 1 listed building.
Bevis Marks is the oldest synagogue in UK. It has been, and remains, in continuous use for religious service and cultural activities ever since. Any redevelopment of the surrounding area needs to be done sympathetically to the historic surroundings.

Yours sincerely

Howard Bogod

Bogod Group Ltd.
91 Goswell Road, London EC1V 7EX.
Reg. No. 4592400 England

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From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 08 October 2024 11:26
Cc: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Subject: Re-Consultation - Bury Street Planning Application

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team
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From:	Katharine Ridler
To:	lpaburystreet
Subject:	Development objection re Bury Street ref 24/00021/FULEIA
Date:	12 November 2024 10:29:52

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THIS IS AN EXTERNAL EMAIL

Dear team

The re-consultation on this application prompts renewed objections:

Bevis Marks Synagogue and its setting would be substantially harmed in heritage terms. The Creechurch Conservation Area would suffer the same harm and similar harm would be inflicted on other heritage assets.

In the Synagogue natural light is essential for reading printed scripts that are essential to the worship and this proposal would destroy much of the essential daylight levels.

The proposal would overshadow the Synagogue (and other buildings and streets) unacceptably and against the conservation area requirements. Furthermore, it would block the passage of the moon in the night sky, another essential part of the Synagogue's worship, traditions and rituals.

This synagogue is unique, nationally recognised as such by its Grade 1 Listed status, with outstanding historic, architectural, artistic, archaeological and communal significance. The previous application by the same applicant (ref 20/00848/FULEIA) was refused in 2022 for two reasons - the impact on both the Synagogue and the Tower of London - and those same reasons apply now for this application.

The design changes claimed by the applicants make barely any difference to the impact on the Synagogue and no member of the public would want to use these claimed benefits in what would be a windy, dark narrow canyon. The Synagogue is now within the Conservation Area: this means the heritage aspects are even higher and make this application void. Please reject it.

Yours sincerely,

Katharine Ridler
(art and architecture editor, long-term visitor to Bevis Marks)

Dr. Everett M. Jacobs Apt. 29, 268 Ecclesall Road South, Sheffield S11 9NU
Email: [redacted]

12 November 2024

lpaburystreet@cityoflondon.gov.uk

Dear Sirs,

Re: Proposals for a 43-story tower at 31 Bury Street (ref. 24/00021/FULEIA)

I write in opposition to the above proposal because of the damage it will do to the Bevis Marks Synagogue and its environs.

My wife's family have been members of Bevis Marks since its creation, and we are still members despite living in Sheffield. I have written to you before about this planning application.

Having read the amended application, I can only say it is a wolf in sheep's clothing. The so-called improved public benefits (space for community groups and small businesses) are directed towards a non-existent 'need', and do not alleviate the detriment the project would cause to the Synagogue.

The proposed building destroys the historic context of Bevis Marks (a Grade I listed building), infringes on the Conservation Area, robs the Synagogue of light, and mocks the significance of Bevis Marks as the oldest, and I would say most important, Synagogue in the UK. Just ask yourselves: would you want this tower to be so close to Westminster Abbey or St Paul's?

The tower does not belong where they propose to build it. I call on you to refuse the planning application.

Thank you for your attention.

Yours faithfully,

Dr. Everett M. Jacobs

From: David Felcher
To: lpaburystreet
Subject: RE: Bevis Marks... reference # 20/00848/FULEIA
Date: 13 November 2024 22:37:15

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THIS IS AN EXTERNAL EMAIL

To Whom It May Concern:

My paternal great-grandfather and his son, born in 1887, were Sefardim from Londontown. And NOW is not the time to trifle with the great Bevis Marks Synagogue. Please respect its sanctity, and prevent any development that would threaten its continuing survival to serve your city's Sefardic community.

Ta,
Dave Felcher
Medford, Oregon, USA

From: BeverleyL
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 14 November 2024 14:57:56

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THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I write in response to the letter of 29 October.

I wish to OBJECT to the proposal (31 Bury Street, ref. 24/00021/FULEIA) for the following reasons.

1. The proposed development will cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

2. Bevis Marks Synagogue is one of the most natural light-sensitive places in London, where extensive
reading of printed scripts is fundamental to worship, and the proposal will have an unacceptable impact on internal daylight levels.

3. The proposal will result in an unacceptable level of overshadowing to the courtyard of Bevis Marks Synagogue, which is used for a variety of community and religious events.

4. The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of Bevis Marks Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

5. Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

6. This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London.

The reasons for refusal in 2022 apply to the new proposal.

I trust you will take these points into consideration and refuse the new application.

Best regards,

(Mrs) Beverley Lawrence

9 Oak Farm Drive
Little Downham
Cambridgeshire CB6 2EA
[redacted]

On Tuesday, 29 October 2024 at 14:52:22 GMT, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

Dear Sir or Madam,

Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.

Kind regards,

Planning Administration Team

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

13 November 2024

Dear Ms Tastsoglou, I trust this message finds you well.

I am writing to express our strong support for the planning application for the redevelopment of Bury House, Holland House, and Renown House (Planning Application Reference: 24/00021/FULEIA). We are particularly enthusiastic about the Cultural Strategy included in this plan, which aims to benefit the local community, schools, and charities like ours.

upReach is an award-winning social mobility charity driven by a vision of a society in which everybody has an equal opportunity to realise their full career potential, regardless of social background. Founded in 2012, we support over 3,000 undergraduates from lower socio-economic backgrounds each year to access and sustain top graduate jobs by delivering a programme of 1-to-1 career coaching, working in close partnership with leading employers and universities.

Our London office is based in the Brick Lane/Spitalfields area, given the close proximity of our London office to Holland House, we are grateful for the opportunity to use its facilities at no cost. This accessible and budget-friendly space has been invaluable to us as a growing charity that needs larger venues for both internal and external meetings / events. It enables us to allocate more of our funding directly to programs for the undergraduates we support rather than to event rental fees, allowing us to maximise our impact.

We have become regular users of the space, both for internal training sessions and events that directly benefit the undergraduates we work with. Bringing students into the City of London, often for the first time, is a transformative experience, as it allows them to envision themselves in potential future careers and build confidence as they navigate their career options.

Looking ahead, we are excited about the redevelopment plans and the expanded possibilities that the Cultural Strategy offers. The upgraded space will further enhance our capacity to hold significant events that are essential to our mission. We envision hosting larger initiatives like our annual Career Festival, a one-day event where undergraduates can explore a variety of career pathways, connect with professionals, and develop employability skills.

Thank you for considering our input and for supporting initiatives that foster community engagement and career development. Please do not hesitate to reach out if you need further information or if we can assist in any other way.

Warm Regards,



Stephanie Lieber
Chief Operating Officer
upReach Charitable Company

From: Ruth Timan
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application 24/00021/FULEIA AND 24/00011/LBC
Date: 16 November 2024 14:30:57
Attachments: Bury Street Re-Consultation Letter.pdf

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THIS IS AN EXTERNAL EMAIL

Dear Ms Anna

I would like to reconfirm my objection to these applications.

- The proposed development would cause substantial harm in heritage terms to Bevis Marks Synagogue and to character and appearance of Creechurch Conservation area;;
- The synagogue is one of the most natural light sensitive in London and the development would cause unacceptable impact on internal daylight levels;
- Overshadowing in the synagogue court yard;
- A similar application by the same applicant was refused in 2022 for two reasons relating to the impact of the proposal on the setting of Tower of London and Bevis Marks Synagogue;

For such reasons and others, I object to granting planning permission.

Regards

Ruth

> On 8 Oct 2024, at 11:26, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or

facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From: Daniel Sacerdoti
To: Ipaburystreet
Subject: Objection
Date: 17 November 2024 11:22:30

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam",

I am writing on behalf to strongly object to the planning application, currently under re-consultation. Bevis Marks Synagogue is a vital heritage and community asset of both national and international importance, and the proposed development would cause irreversible harm to its significance and functionality.

Key Objections:

1. Heritage Impact:
    - Bevis Marks Synagogue, a Grade I Listed building dating from 1701, is recognized as the oldest and most historically significant synagogue in the United Kingdom. It holds outstanding communal, architectural, artistic, historic, and archaeological importance.
    - The proposed development would cause substantial harm to the Synagogue's heritage significance and its setting, as well as to the character and appearance of the Creechurch Conservation Area. It would also result in less than substantial harm to other heritage assets.
2. Daylight and Overshadowing:
    - The Synagogue is uniquely light-sensitive, with natural daylight playing a fundamental role in its worship practices, including the extensive reading of printed scripts. The proposed development would lead to a significant reduction in internal daylight levels, adversely affecting worship and other activities.
    - Additionally, the development would overshadow the Synagogue's courtyard, a space used extensively for community and religious purposes, diminishing its usability and atmosphere.
3. Symbolic Views of the Night Sky:
    - The view of the passage of the moon across the night sky holds deep symbolic and ritualistic significance for the Synagogue. The proposed development would block this critical view, disrupting traditions that are essential to the Synagogue's spiritual and cultural practices.
4. Historical Context and Previous Refusal:
    - A similar application (ref. 20/00848/FULEIA) by the same applicant was refused in 2022 due to its detrimental impact on the settings of both Bevis Marks Synagogue and the Tower of London. These reasons for refusal remain equally valid today, and the adjustments in the current application do little to mitigate the harm.
5. Public Benefits vs. Harm:
    - The applicants suggest that the revised design, which includes space for

community groups and small businesses, offers public benefits that outweigh the harm. However, these changes fail to address the substantial negative impact on the Synagogue, and any perceived benefits are minimal at best.
    - Furthermore, the heritage “bar” has now been raised, as the Synagogue is newly recognized as being within a Conservation Area, further underscoring the inappropriateness of the proposal.

In summary, Bevis Marks Synagogue is a building of unparalleled heritage and cultural value, whose significance and function would be critically compromised by this development. The minor adjustments proposed do not begin to address the adverse effects identified in the previous refusal and continue to render the application unacceptable.

I urge the City of London Corporation to reject this planning application and uphold the protection of one of the nation’s most treasured heritage assets.

Thank you for considering this objection.

Yours sincerely,

Daniel Sacerdoti
Parnes Presidente
Spanish and Portuguese Jews Congregation

From:	Marlena Schmool
To:	lpaburystreet
Subject:	Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date:	17 November 2024 16:33:44

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THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I write, again, to lodge objections to these proposals.

As a member of Bevis Marks Synagogue, I feel strongly that the proposed development will greatly harm the 300 year old Synagogue. As a regular attender I know that the light will be greatly affected and perhaps make it impossible to read in certain places. I also have worries about the affects such a structure might have on the fabric of our building.

I feel that these new proposals are cynical given that a very similar application was refused some two years ago. The conditions which led to this refusal still apply. The minor changes in these new proposals provide little benefit to the Synagogue and do not outweigh the damage a 43-storey tower could do to it.

Yours faithfully,
Marlena Schmool
11 Defoe House,
London EC2Y 8DN>

From: Miriam Kramer
To: lpaburystreet
Subject: Planning application ref 24/00021/FULEIA
Date: 18 November 2024 13:16:11

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THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam

I wish to object, as I have previously, to the revised application for a 43-storey tower at 31 Bury Street.

All my previous points still hold and since reviewing the revision I have more to add:

The changes include 'public benefits' which have little or no benefit to Bevis Marks Synagogue. The fact still remains that there will be a significant reduction of daylight on this Grade 1 listed building, which relies on such illumination for many of its religious activities.

In addition the Synagogue has recently been included in the Creechurch Conservation Area. This should give it added protection; the original and revised plans do not achieve this.

Thirdly, I would like to remind you that Bevis Marks Synagogue is the oldest site of continuous Jewish religious activity not only in the City but in the country. Its value to the local and general communities is incalculable.

Finally, I would repeat that at a time when so many office buildings remain partially or completely unoccupied it seems absurd that such a large building in such a sensitive location should even be considered. The proposed addition of a small amount of 'community space' would not make a significant impact.

I trust that the City of London will once again refuse permission for this unsuitable application.

Miriam Kramer

Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

15 November 2024

Dear Ms Tastsoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Follow-Up Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we write further to our previous letter dated 15 May 2024, in relation to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

This letter comprises a follow-up objection including:

- Further evidence in relation to daylight/sunlight which has been prepared on behalf of our client; and
- Responses to the letter prepared by the Applicant's agents DP9 dated 27th September 2024, specifically in relation to the GIA Lunar Transit Study;
- A letter from Professor Barry Stiefel, Professor of Historic Preservation & Community Planning at the College of Charleston, regarding the significance of the sky view for Bevis Marks Synagogue; and
- The findings of a review of the applicant's Equalities Statement prepared by the barrister Claire Nevin.

Generally

Our client's position remains that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.

As you are aware, a previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. It is abundantly clear that the building now proposed will have just as much impact upon the Synagogue and the other heritage assets as the one proposed previously, and that the only material change in circumstances is that the area is now designated as a Conservation Area, which means that heritage impacts should attract **even greater weight**, and Policy CS14(2) of the City Plan (which contains a strong presumption against tall buildings in Conservation Areas) is engaged.

It is clear the applications should be refused, for the following reasons (inter alia):

1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and empirical evidence of poor daylighting.

2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused.

4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration.

5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use.

6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits.

7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it).

As planning officers of undoubted integrity, I trust you and your colleagues will recognise the above, and also that any attempt to justify recommending approval would be both improper and wide open to legal challenge.

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Bevis Marks Synagogue Daylight Report

On behalf of our client, Prof John Mardaljevic and Dr Stephen Cannon-Brookes (respectively of Daylight Experts and Cannon-Brookes Lighting and Design) have prepared a report regarding the daylight position in the Synagogue. The report (enclosed at **Appendix 1**) provides an assessment of the existing daylight levels in Bevis Marks Synagogue and considers how these would be likely to be affected by proposed development.

It represents the only empirical study of the Synagogue undertaken by anyone. All assessments made by third party consultants are based on assumptions and estimates.

The study was originally commissioned in 2022 in the wake of the then planning applications for very damaging tall office towers on the sites of 31 Bury Street and 33 Creechurch. Whilst the original planning applications for those sites have since been refused/withdrawn, there is now a fresh planning application for 31 Bury Street; hence the study results, which cover a two-year period, are of considerable topicality.

Background

The Synagogue was originally designed to be well daylit, with large windows on all four sides which satisfied both the spiritual and functional aspects of worship. Members of the congregation expect to be able to read during services using daylight. The point is well made by this illustration from 1884.



Figure 1: Bevis Marks Synagogue, 1884

Over the years, tall buildings have been constructed on neighbouring sites which has had a significant effect on the daylighting of the interior. The surrounding courtyard has increasingly been shaded from the sky, and this has resulted in a progressive lowering of internal daylight levels within the Synagogue.

Methodology

The report is informed by a long-term assessment of the lighting levels at the Synagogue which was carried out between 26th February 2022 to 2nd April 2024. The assessment was carried out using two illuminance meters, which are widely used to record light levels in museums and other heritage buildings.

The illuminance meters were placed in the central area of the ground floor (Sanctuary), both at a height normal for holding a prayer book. The two locations were selected to capture typical daylight levels experienced on the ground floor of the Synagogue. Light levels were recorded at five minute intervals continuously throughout the monitoring period.

Daylight is measured in lux units (lx), which can be understood as follows:

> Below 25lx - many occupants, particularly the elderly, will experience difficulty reading. The Synagogue is likely to appear drab and gloomy.
>
> Between 25lx - 50lx - many occupants may be able to read printed paper, provided the text is not too small. 50lx is generally regarded as sufficiently dark that most museum exhibits will not be harmed by exposure to that amount of light.
>
> Between 50lx - 100lx - most/all of the occupants are likely to be able to read printed paper, and the Synagogue is likely to begin to appear pleasantly daylit.
>
> Above 100lx - the Synagogue will be perceived as having a more pleasant/daylit appearance.

Existing Daylight Levels

The results of the assessment of existing daylight over a two+ year period showed that:

> The Synagogue is a fundamentally daylit building. Some electric lighting was installed in the 1920s, but artificial lighting is culturally inappropriate, and furthermore there is little if any scope to install more lighting in what is now a Grade 1 Listed building of the highest significance. In winter, the daylight levels are barely adequate.
>
> In general, daylight levels at the Synagogue are at a 'tipping point' where additional shadowing by nearby proposed developments could plunge the Synagogue into permanent winter daylight conditions, or worse.

Figure 2 in the report shows the typical daily hours lux levels achieved over the monitoring period:

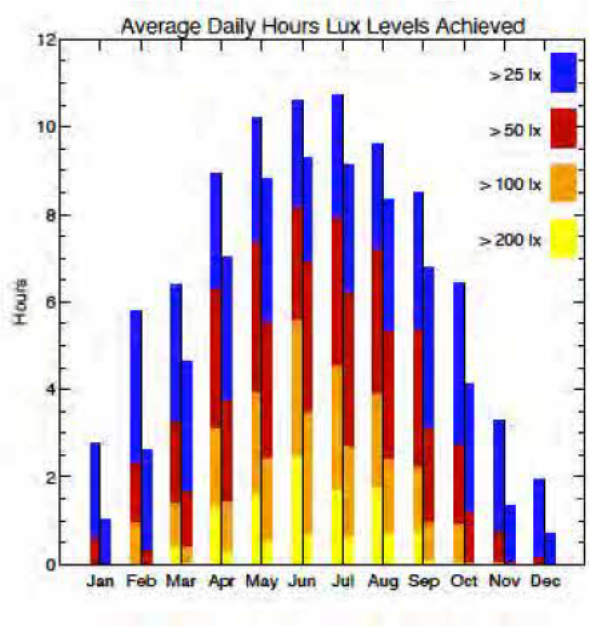


Figure 2: Average Daily Lux Levels Achieved

It is clear that in the winter months particularly, daylight in the Synagogue is very limited. Indeed, for a quarter of the year, the light levels never exceed 100lx (i.e. they are always blue or red on the graph above). Even in the summer months, much of the daylight is still at or below 100lx.

The report also considers how surrounding development that overshadows the courtyard of the Synagogue has an impact on internal light levels. On sunny days, the results show a pattern of a large dip in internal light level readings between around 08:30 to 10:00[1], after which light levels rise again. This is a result of the overshadowing of the Synagogue by neighbouring buildings.

Figure 5 in the report, below, demonstrates that when the courtyard is shaded by the very tall neighbouring building at One Creechurch Place, this has a significant and direct impact on internal light levels. For example, at 09:00 on 8 May 2022, the courtyard was fully in shadow. The illuminance levels (shown by the red and blue lines representing each illuminance meter) therefore dropped significantly (to below 25lux in one case, and below 50lux in the other); at 10:00, when the courtyard was no longer in shadow, the illuminance levels recovered.

The report confirms that this is a persistent pattern across the monitoring period which could not be explained by cloud patterns etc. This demonstrates the significant impact that the development of tall buildings in the vicinity of the Synagogue has already had on internal light levels.

[1] The timing will vary according to the date, but the phenomenon will occur in any event

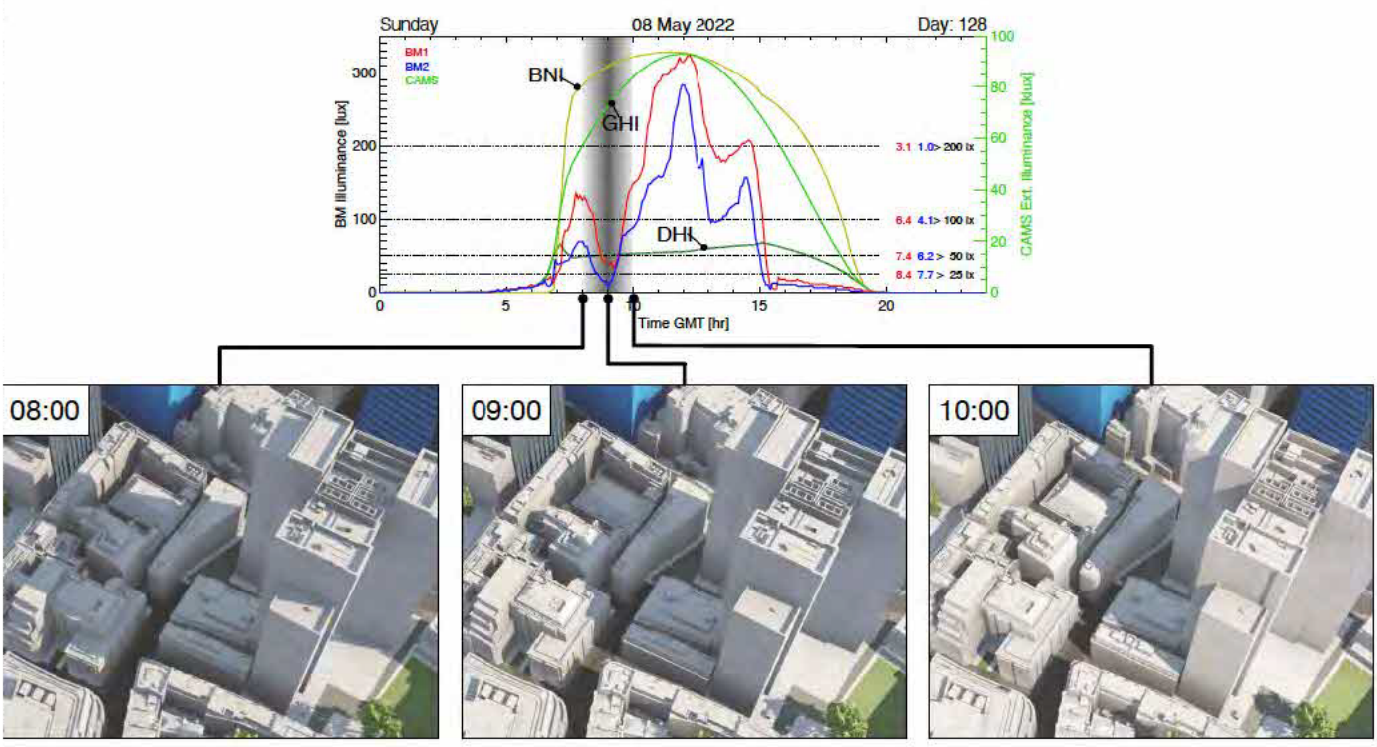


Figure 3: Impact of One Creechurch Place shadow on Bevis Marks

Potential Impact on Daylight Levels

The report goes onto consider the potential further impact on daylight levels within the Synagogue, should the proposed tall building at 31 Bury Street be approved and built. Figures 4 and 5 below show that for 31 Bury Street, on the same day (i.e. 8 May 2022), its shadow would begin to encroach on the Synagogue courtyard area around 11:00, and between 12:00-13:00 the courtyard area is heavily shaded, with shadow gradually receding until 14:00. Figures 4 and 5 relate to light monitors BM1 and BM2 respectively, with the pink and bright blue lines showing the position with 31 Bury Street in place.

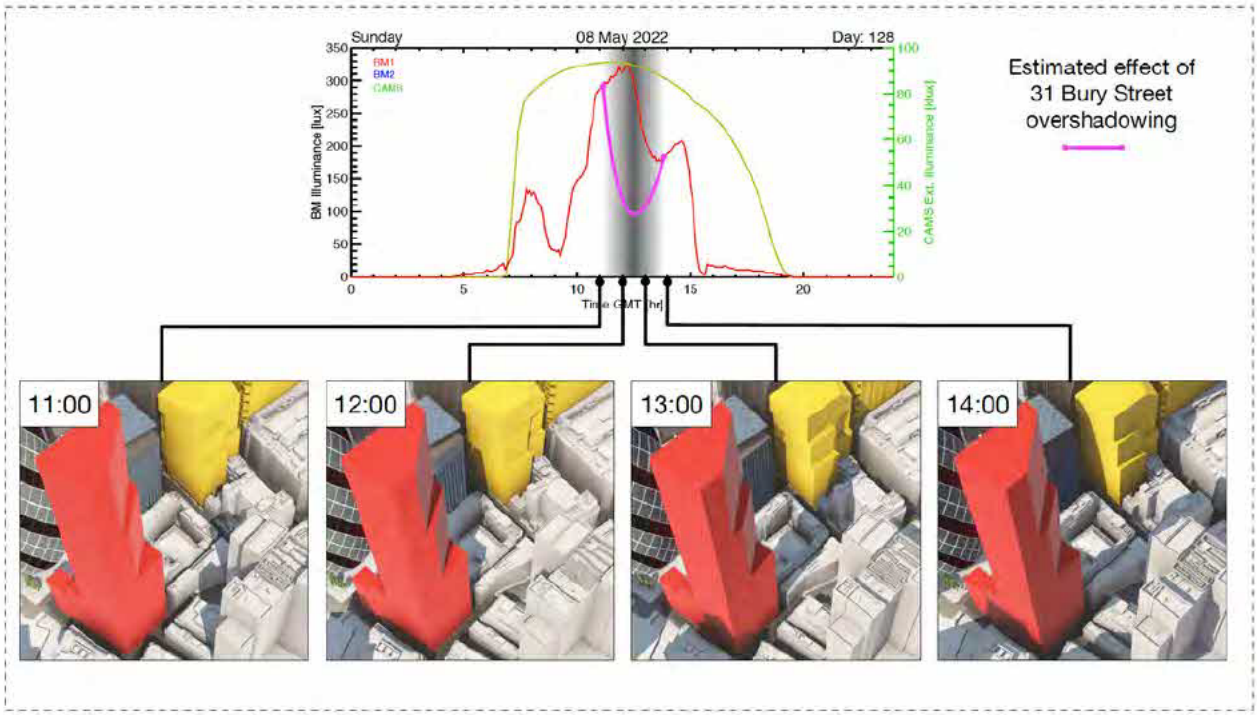


Figure 4: Progression of shadow cast by proposed development on Bevis Marks on light monitor BM1

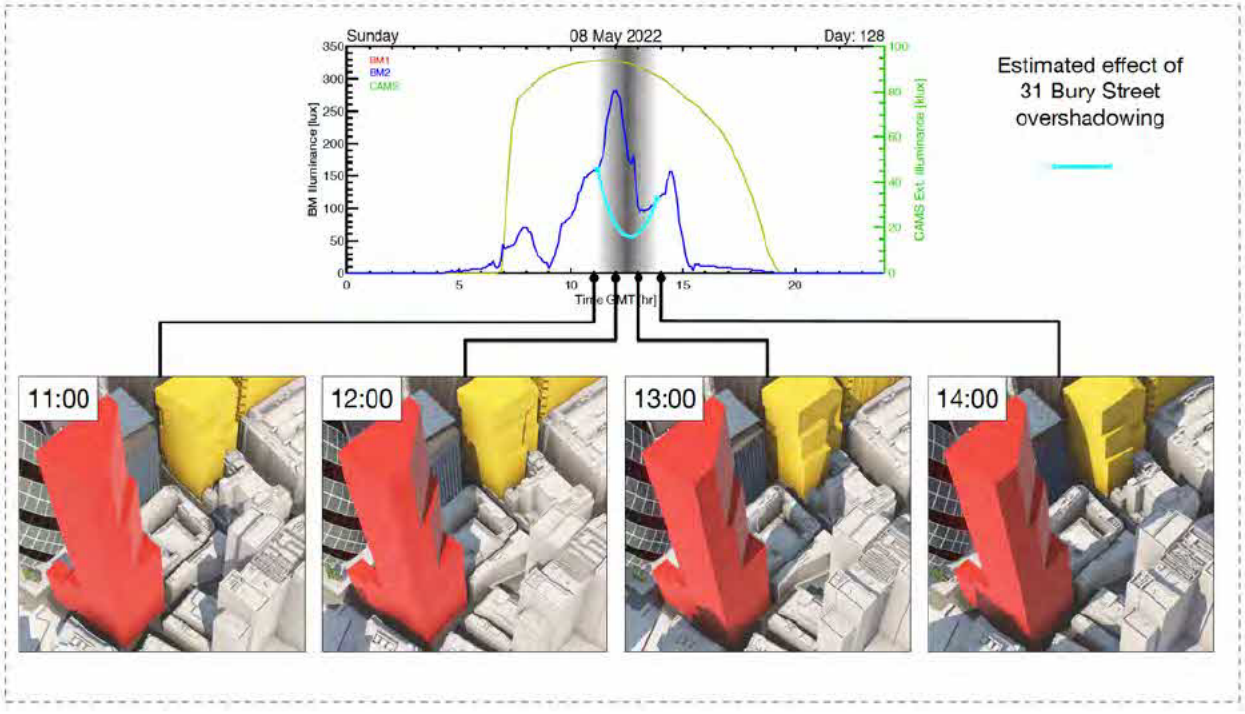


Figure 4: Progression of shadow cast by proposed development on Bevis Marks on light monitor BM2

The cumulative effect of the proposed development with One Creechurch Place is severe and would result in an unacceptable loss of light to the Synagogue.

Conclusions Regarding Daylight

This report contains the most thorough data available regarding the existing position of daylight in the Synagogue. It confirms that daylight levels at the Synagogue are at a 'tipping point' where additional shadowing by nearby proposed developments could plunge the Synagogue into something close to permanent winter daylight conditions, or worse. The projection that has been done for the effect of the proposed tower at 31 Bury Street shows a dramatic worsening of the Synagogue's daylight, resulting in an unacceptable cumulative effect.

This new evidence is of sufficient importance that we request formally that you require the applicants to respond to it in detail.

Response to DP9 letter dated 27th September 2024

The Applicant's agent, DP9, has prepared a detailed response to our previous letter dated 15th May 2024. This includes at Appendix 3 a Lunar Transit Study prepared by GIA.

Lunar Study

Rabbi Morris of Bevis Marks Synagogue has reviewed GIA's lunar study in great detail, and raises a number of issues with the way that the data has been presented, in relation to the practical matters that affect the Synagogue and its special requirements. His assessment is enclosed at **Appendix 2**.

GIA have reported that London has cloudy conditions 58% of the time based on information gained from the website https://weatherspark.com. As a result, they conclude that the moon is only visible 2.2% of the time from Bevis Marks Synagogue's courtyard. In reality, cloud cover is by no means a binary matter - it often changes over short periods of time, and often the moon can be seen through a veil of cloud. In contrast, buildings are fixed; once a building is constructed, for all intents and purposes it becomes perpetually densely 'cloudy' with respect to the lunar visibility.

Beyond this, the variability of climate conditions itself plays an important role in the monthly 'Kiddush Levana' rituals. Jews go outside after dark looking to see whether or not the moon is visible, wherein a cloudy sky is considered to be a bad omen, and a clear sky a positive one, as it allows for the prayer to be recited. The fixed reduction of visibility by the proposed tower would be a permanent obstruction, removing this variability which is central to the meaning of the ritual.

Furthermore, as reciting the prayer only takes a quarter of an hour, the preservation of sufficient unobstructed sky allows for the possibility that any cloud cover will pass, thus enabling the prayer to be recited despite earlier cloudy conditions.

Rabbi Morris has reviewed GIA's data and finds that the proposed development would prevent visibility of the moon in, on average, three months of the year when it is currently visible. At present, the Kiddush Levana prayer can be recited on average in nine months of the year. This is therefore a very significant reduction in the number of months of the year in which it is possible to recite the prayer.

GIA go on to claim that the moon is currently only visible for 2.2% of the time, and the proposed development would reduce that only to 1.8%, implying this is such a small change that it is of little consequence. However, that is a complete mischaracterisation of the position. Even if the figures were correct, the reduction amount is considerable. It is trite to say so, but as something gets smaller, it becomes more precious, and so the sensitivity to further loss becomes more acute.

It is noted that BRE has also been instructed to review the GIA report on behalf of the City of London, and that they reach a similar conclusion to the rabbi:

"With both the consented and proposed developments in place (in the cumulative scenario), the opportunity to view the moon from the observer location used by worshippers at Bevis Marks Synagogue when reciting Kiddush Levana would reduce by 51% on average throughout a full lunar cycle, compared to the existing baseline."

Finally, and very importantly, this is a matter which is deeply entwined with the history of Judaism and of the Synagogue. Below is a woodcut from 1695, showing Jews revering the moon and the stars at the synagogue in Amsterdam.



Figure 5: 1695 Woodcut

The synagogue shown is a relatively low building, open to the sky, exactly as Bevis Marks Synagogue was when it was built around the same period.

Below is another image, showing the same phenomenon at a synagogue in Germany in 1726.



Figure 6: Illustration of a synagogue Germany (1726)

Enclosed at **Appendix 3** is a letter from Professor Barry Stiefel, Professor of Historic Preservation and Community Planning at the College of Charleston. Professor Stiefel is a leading expert in Western Sephardi Synagogue architecture. Professor Stiefel's letter sets out in detail the cultural and religious significance of the sky view for the community at Bevis Marks Synagogue, with reference to religious observances, daily prayers, festivals, and its cultural, historic, mystical and symbolic significance. Professor Stiefel concludes that even partially blocking the important sky view would lead to disruption for the Sephardic Jewish community at Bevis Marks Synagogue.

What we have here is not only very important to the modern day religious and cultural rituals of a minority ethnic group, but something which is fundamental to the significance of the heritage asset. The sky view is not just a matter of aesthetics; it serves a purpose which has always been an important and integral part of the functioning of the building.

Enabling Development and Viability

The letter prepared by DP9 states that they do not make an 'enabling development' argument and we understand from our previous discussions that viability evidence has not been requested from the applicant. We have sought advice from Lord Banner K.C. on this matter and his advice (enclosed at **Appendix 4**) is that:

"it would be amply open to the Council to take the view that the "clear and convincing justification" for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist without (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of harm that would be caused - including viability evidence."

We therefore remain of the view that the applicant should provide viability evidence to demonstrate that the claimed benefits (including heritage benefits) of the scheme cannot be achieved without the extent of harm that would be caused. It is indisputable that a very tall building on the 31 Bury Street site would cause considerable harm to Bevis Marks Synagogue and the Tower of London. The applicants are effectively arguing that the benefits of the proposed development (including heritage benefits) would, in their opinion, outweigh those harms as well as clear conflict with the statutory development plan. For the Corporation to be able to consider that argument, it will require robust evidence that a building of the dimensions proposed (a) can deliver the benefits claimed, and (b) is no taller than necessary for the balance to be capable of being tipped in its favour, i.e. viability evidence.

We again formally request that you require proper evidence from the applicants. If such information is not provided, we put you on notice that this will form part of any legal challenge in due course.

Equalities

Our previous objection raised concerns regarding the Equalities Statement submitted as part of the application. We note DP9's response which states their view that the submitted Statement is sufficient. We have instructed Claire Nevin, a barrister specialising in environmental and human rights law, to carry out a review of the Equalities Statement (enclosed at Appendix 5). The review sets out, in summary, that "*the Equalities Statement is not sufficiently detailed on the potential impacts on the Jewish community at BMS to continuing worshipping in accordance with their faith. The failure of the Equalities Statement to address several key aspects [...] does not comply with the Guidance and case law*". The review concludes that were the City of London to rely on this Equalities Statement alone to discharge their Public Sector Equality Duty (PSED), it would be in breach of the duty.

The decision maker (i.e. the City of London's Planning Committee) must have due regard to the factors set out at Section 149 of the Equalities Act 2010. Ms Nevin concludes that if the City of London were to decide to grant planning permission, a formulated statement of reasons would be required in accordance with the Supreme Court's ruling in *Dover DC v Campaign to Protect Rural England (Kent) [2017]*. A formulated statement of reasons would be required because:

> There is substantial public opposition to the proposals.
>
> A very similar proposal was refused in 2022 and the area now enjoys heightened statutory and policy protections due to its recent designation as a Conservation Area. The proposal is therefore likely to involve major departures from the development plan and other policies of recognised importance.
>
> Given the City of London's recent decision to refuse a similar application, and the recent designation of the Conservation Area, a formulated statement of reasons would be required to explain consistency of decision making.
>
> The decision would be likely to have both an immediate impact on the Jewish community and lasting relevance for the application of policies relating to tall buildings and conservation areas in future cases.

> Section 149 contains a positive duty to have 'due regard' to equalities impacts. In the absence of a formulated statement of reasons, it would otherwise be difficult to ascertain whether the City of London complied with this duty.

It is therefore important that Members of the Planning Committee are made aware that a formulated statement of reasons should be provided in the event that they were minded to resolve to grant permission for the application.

Ms Nevin's review also draws comparisons between the current application at 31 Bury Street, and the application for the 'Tulip' skyscraper, which was refused by the Secretary of State in November 2021 (ref. APP/K5030/W/20/3244984). Bevis Marks Synagogue was amongst the heritage assets considered in the decision, with the Secretary of State finding that the "wider setting" of the Synagogue "*includes a number of office towers, visible from the courtyard.*"

Regarding Bevis Marks Synagogue and a number of other heritage assets, the Secretary of State remarked that the Tulip would "*cause a marked exacerbation in the existing harm from tall buildings to the setting of the assets and the ability to appreciate their architectural or historic significance. The effect would be variously to create an overbearing presence from within the curtilage of the heritage asset (…)*". This clear view expressed by the Secretary of State is a material consideration that must be taken into account when determining the application at 31 Bury Street.

Ms Nevin concludes that: *"It is trite that planning authorities must carefully balance different (sometimes competing) factors and decide how they should weigh in the overall balance. However, certain factors will always weigh more heavily in the balance than others. The Guidance clearly states "the greater the relevant potential impact, the higher the regard required by the duty." Considering the importance of the PSED and the extent of the potential impacts of the development proposal on the Jewish community at BMS, I consider that this is a case that warrants the heightened regard envisaged by policy and by extension, substantial weight in the overall planning balance."*

Conclusions

In summary, none of the material produced by the applicant or their agent in response to our previous objection changes our client's position and our strong objections previously set out. The additional evidence enclosed with this submission provides further reasons why the application should not be approved.

The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence, and because the significance of the sky view is now better understood. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it, let alone to justify a clear conflict with City Plan Policy CS14.

The applications should be refused. However, in order for you to be in a position properly to report them to Committee, we reiterate our request that you require the applicants to respond in detail to the empirical evidence on daylight, and to produce a viability assessment to justify their *de facto* enabling development case. You might also think it appropriate to suggest they produce a robust Equalities Statement to assist you in your reporting on this most important and sensitive matter.

Yours sincerely,



Roger Hepher
Executive Director

Appendix 1 - Bevis Marks Daylight Report 2024

Bevis Marks
Daylight Report 2024

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Dr. Stephen Cannon-Brookes
PhD FSLL

Prepared for the Sephardi and Portuguese Congregation

FINAL VERSION: 26/ 10/ 2024

Daylight-Experts.com
Expert Witness / Simulation / Measurement / Conservation

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Executive Summary



Bevis Marks Synagogue, 1884 (John Crowther)

In order to determine if the Bevis Marks Synagogue is at risk from significant loss of daylight due to proposed nearby developments, it is necessary to establish two matters of fact:

1. The current levels of daylight provision in the Synagogue.
2. The expected reduction in daylight provision to the Synagogue caused by the proposed developments.

The first can only be determined reliably by direct measurement of daylight levels in the Synagogue over extended periods. The second can only be estimated using a realistic prediction method which minimises the uncertainty in the outcome.

This report focuses on the findings of a long-term measurement campaign to quantify the daylight provision in the core of the Bevis Marks Synagogue. The measurements, using two conservation grade light meters, were carried out over a two year period from 26th February 2022 to 2nd April2024. Theresultsattestto thefactthattheSynagogueisa functionally daylit buildingforconsiderableperiodsoftheyear:overwinterthedaylightlevelsarebarelyadequate, buttheyimproveconsiderablyf ortheotherninemonthsoftheyear.Thedataalsoshow that thedaylightlevelsi n theSynagoguearedata‘ti ppingpoint’–significantadditi onalshadowing by nearby proposed developmentscould plungetheSynagogueintopermanentwinterdaylight conditi ons,orworse. Thereportalso providesguidanceregarding theselection ofa suitable prediction method to estimatethelossofdaylightprovision to theSynagoguecaused by the proposeddevelopments.

1 Introduction

To set the picture, the Synagogue was designed to be well daylit with large windows on all four sides to meet spiritual and functional aspects of worship. That the latter has always involved the congregation reading during services is confirmed by the presence of lockers beneath every seat, some of which predate the Synagogue and that are still in use. Members of the congregation expect to be able to read during services using daylight, which as of tradition plays a role in the timing of services. This helps to explain why the generous number of original chandeliers were not electrified during the 20th century, since, as in early the 18th century, appropriate candles are expensive and their use is reserved for special services. Furthermore, it is the minimal level of material change since then that earned the current Grade 1 listing of the building, its fabric and furnishings.

Whilst the building and its use remain largely unchanged the same cannot be said for its surroundings and this has had a substantial effect on the daylighting of the interior. The narrow surrounding courtyard has maintained a perimeter of space though one increasingly shaded from the sky by the rising height of adjacent buildings. The consequences of this can be read in the interior with redundant boxes above the upper level windows on the SE and SW walls. In the past these housed blinds to diffuse direct sunlight, now largely blocked by adjacent buildings. Change has been incremental, but always in the direction of lower daylight levels as the height of these buildings increased. An earlier report by surveyor GIA presented the current conditions showing how little direct view of the sky remains from the Synagogue's windows.

Site measurements of light levels indicate that the interior is on the cusp of losing work-able levels of daylight under most sky conditions. Review of existing conditions and schematic modelling indicates that the daylighting in the Synagogue is now largely dependent on reflected light from the surfaces of the buildings surrounding the courtyard. This is most obvious during periods of sunlight, the absence of which is easily perceived since levels are considerably lower when sky is overcast. At these times, the current and relatively sparse electric lighting on the columns is utilised, but, as reported, even when members of the congregation tend to congregate around the columns, light levels are insufficient for these to be an effective alternative means of illumination.

2 Measuring the Daylight Levels in Bevis Marks

Illuminance is a measure of the amount of light (i.e. the luminous flux per unit area) under normal viewing conditions. Illuminance has a unit of lux (often shortened to lx). Illuminance is the quantity most commonly used to assess illumination levels in buildings. For example, to specify the artificial lighting in an office, usually something in the range 300lx to 500lx. Verification of an artificial lighting system would be carried out using a lightmeter, e.g. taking measurements at various desks to ensure that the design intent (say, 300lx across the desks) has been achieved.

In contrast to artificial lighting, verification of daylight levels in a building is far more complex. The quantity and quality of daylight in buildings is continually varying due to the natural changes in sun and sky conditions from one moment to the next. These changes have components that are: random (e.g. individual cloud formations); daily (i.e. progression from day to night); and, seasonal (e.g. changing day length and prevailing weather patterns). Accordingly, to be reliable, any measurement of daylight provision in a building must be taken over a period of at least a full calendar year. Daylight levels measured outside vary enormously.[1] For example, in the Midlands (UK), typical daylight levels at noon vary from ~60,000lx in summer to around ~10,000lx in winter. Peak values under the sunniest conditions can reach in excess of ~90,000lx. Half an hour after sunrise (or half an hour before sunset), daylight levels will be around ~1,000lx. Thus, any meaningful assessment of daylight provision indoors must describe the degree of occurrence of,

[1] Here we refer to measurements taken on the horizontal plane in an unobstructed outdoor setting, i.e. with a full view of the hemispherical sky vault.

usually, particular daylight levels throughout the year. How this was achieved for Bevis Marks is described in the sections that follow.

2.1 Daylight Measurement Strategy

Two logging illuminance meters (referred to as BM1 and BM2) were used to record the daylight levels in the Synagogue. The meters employed were newly purchased Hanwell ML4701 LUXBUGS, which are widely used to record light levels in museums and heritage buildings. They were placed in the central area of the ground floor (Sanctuary), as can be seen in Figure 1. BM1 was located on the edge of the Bimah and BM2 on the pew closest to the Ark, both at the height normal for holding a prayer book. These locations were selected to capture the range of daylight levels across the core of the ground floor area of the Synagogue. Perimeter areas, under the balconies were not considered as scaffolding was present around the ground floor windows at the start of monitoring. Light levels were recorded at five minute intervals continuously throughout the monitoring period. There were occasional losses of data due to the practicalities of long-term light monitoring in an occupied space. For example, due to internal memory overflow. And one occasion when BM1 was misplaced for a number of weeks following a wedding.

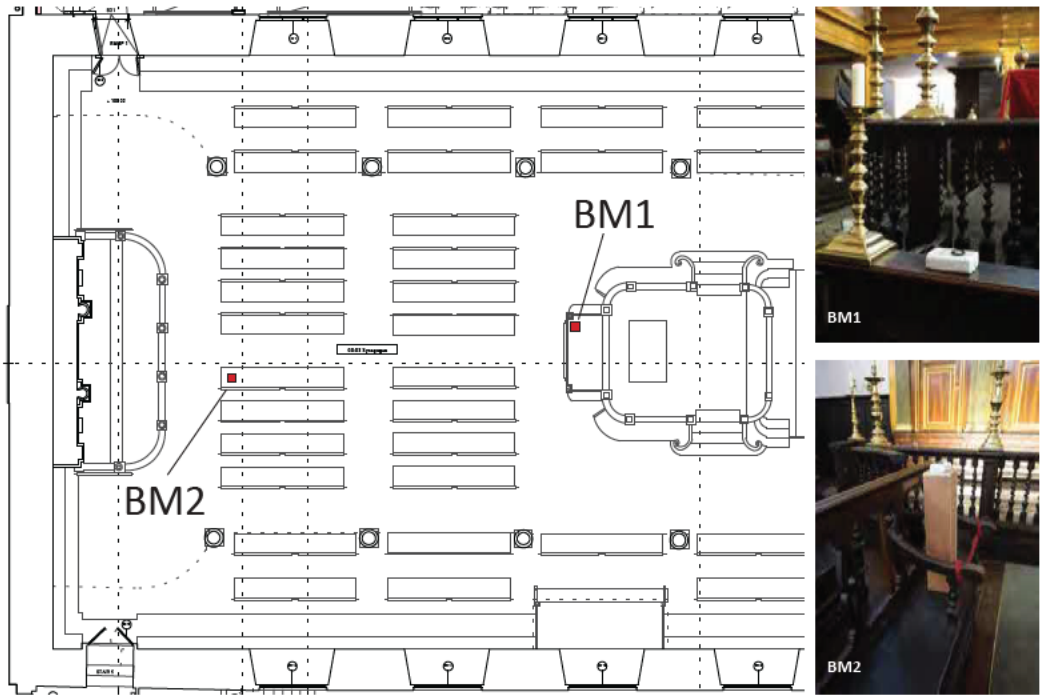


Figure 1: Location of Hanwell loggers BM1 and BM2

2.2 Determining Daylight Provision from the Measured Illuminance Data

The monitored illuminance data used to quantify the long-term daylight provision in the Synagogue were recorded between 26th February 2022 and 2nd April 2024 by logging meters BM1 and BM2. In total, there were 767 full days of measurements where either one or both loggers were recording (equivalent to approximately 2.1 years of data). The rationale for processing the data into metrics that characterises the overall daylight provision in the Synagogue was as follows:

i. All the measured data should be used to avoid bias in the presentation of the results, i.e. no 'cherry-picking' of measurements.

ii. Results should be presented on a monthly basis to reveal how the daylight levels vary across the year.

iii. For each month, the average daily occurrence in hours of key daylight levels should be determined from the measurements.

iv. The key daylight levels used should relate to human visual performance requirements and preferences.

v. Results are normalised to monthly totals, but there should be no interpolation/ estimation of missing data.

The key illuminance levels used to characterise the daylight provision are: 25lx, 50lx, 100lx and 200lx. The minimum key value of 25lx is approximately the lowest illuminance level advised for use in public spaces when lighting needs to be strictly limited, invariably for conservation purposes in museums and art galleries to protect particularly delicate artworks, fabrics, etc. A more typical illuminance level used for all but the most delicate artefacts is 50lx. Daylight illuminance levels around 50 to 100lx are typical in many residential rooms under moderately bright overcast skies. Under daylight illumination levels of 50–100lx, occupants may often be content to read books/ newspapers without additional lighting providing the eye has adapted and there are no contrast issues (e.g. bright window in the field of view). All the same, they might *prefer* illuminances greater than 100lx, particularly if reading for extended periods. Note that the response of the human eye is such that a doubling of brightness is perceived as a significant change, whereas a smaller incremental edition might be difficult to notice. Accordingly, the final illumination level for consideration is set to 200lx.

The likely implications for the occupants of the Synagogue experiencing the various illuminance ranges are summarised as follows:

- Below 25lx many occupants, particularly the elderly, will experience difficulty reading. Those who are not too elderly and with good eyesight may manage to read provided the daylight levels are above 10lx.[2] The Synagogue is likely to appear drab and gloomy.
- Between 25–50lx many of the occupants may be able to read printed paper, provided the text is not too small. The Synagogue is likely to appear dim at the lower end of the range (~25lux), but noticeably brighter at the upper end (~50lux)
- Between 50–100lx most/ all of the occupants are likely to be able to read printed paper without undue discomfort, unless they have marked visual impairment. The Synagogue is likely to begin to appear pleasantly daylit.
- Between 100–200lx there are likely to be few significant improvements in visual performance for the majority of occupants. However, the synagogue is likely to be perceived as having a markedly more pleasant/ daylit appearance.
- Illuminances greater than 200lx probably not needed for the majority of tasks carried out in the Synagogue. However, the additional brightness imparted would be perceived as further 'enlivening' the Synagogue, and therefore welcomed by the occupants.

[2] Young adults with standard vision can generally read fairly well down to illuminance levels in the range 5–10lx. However, as visual acuity declines by roughly a factor of three between the ages of 20 and 60, older people invariably need multiples of these light levels to read, often supplemented by eye correction (glasses etc).

2.3 Daylight Monitoring Results

The illuminance levels in the Synagogue recorded at locations BM1 and BM2 in the period between 26th February 2022 and 2nd April 2024 are presented in both tabular and graphical form. The data were processed to show the average daily occurrence in hours that the four key illuminance levels were achieved (i.e. exceeded) on a monthly basis. A summary of the complete analysis is shown in Table 1. For example, for the month of February, an illuminance of 25lx was achieved (on average) for 5.8 hrs (BM1) and 2.6 hrs (BM2).[3] Whereas an illuminance of 50lx was achieved (on average) for 2.3 hrs (BM1) and 0.3 hrs (BM2).

	BM 1 Hours lux value achieved				BM 2 Hours lux value achieved			
Month	> 25lx	> 50lx	> 100lx	> 200lx	> 25lx	> 50lx	> 100lx	> 200lx
Jan	2.8	0.6	0.0	0.0	1.0	0.0	0.0	0.0
Feb	5.8	2.3	0.9	0.0	2.6	0.3	0.0	0.0
Mar	6.4	3.2	1.4	0.4	4.6	1.7	0.4	0.0
Apr	8.9	6.3	3.1	1.3	7.0	3.7	1.4	0.3
May	10.2	7.4	3.9	1.6	8.8	5.5	2.4	0.5
Jun	10.6	8.2	5.6	2.5	9.3	6.9	3.5	0.7
Jul	10.7	7.9	4.5	1.7	9.1	6.2	2.6	0.6
Aug	9.6	7.2	3.9	1.8	8.3	5.3	2.4	0.7
Sep	8.5	5.4	2.2	0.7	6.8	3.1	1.0	0.1
Oct	6.4	2.7	0.9	0.0	4.1	1.2	0.0	0.0
Nov	3.3	0.8	0.0	0.0	1.3	0.0	0.0	0.0
Dec	1.9	0.2	0.0	0.0	0.7	0.0	0.0	0.0

Table 1: Average daily hours key illuminance values achieved on a monthly basis

The data in Table 1 are presented graphically in Figure 3. Two bars are shown for each month, the left hand is data from BM1 and the right from BM2. Colour coding is employed to show the number of hours achieved for the four threshold light levels (25, 50, 100 and 200lx). Note the 'bars' are superposed rather than stacked – see illustration in Figure 2. For example, in July, 25lx is achieved (on average) for 10.7hrs (BM1) and 9.1hrs (BM2). Whereas 200lx is achieved for 1.7hrs (BM1) and 0.6hrs (BM2).

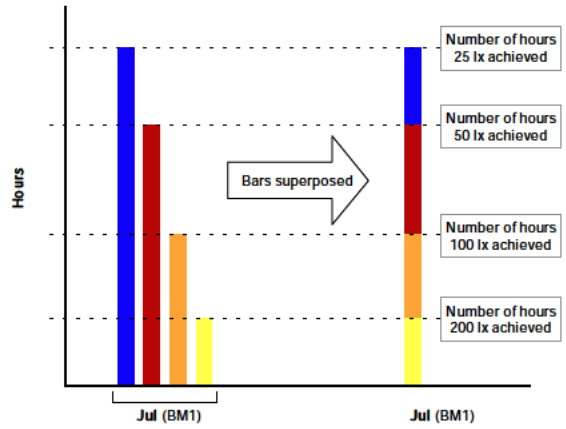


Figure 2: Illustration showing superposition of bars in Figure 3

[3] Decimal hours are shown, e.g. 1.5hrs equals 1hr 30mins.

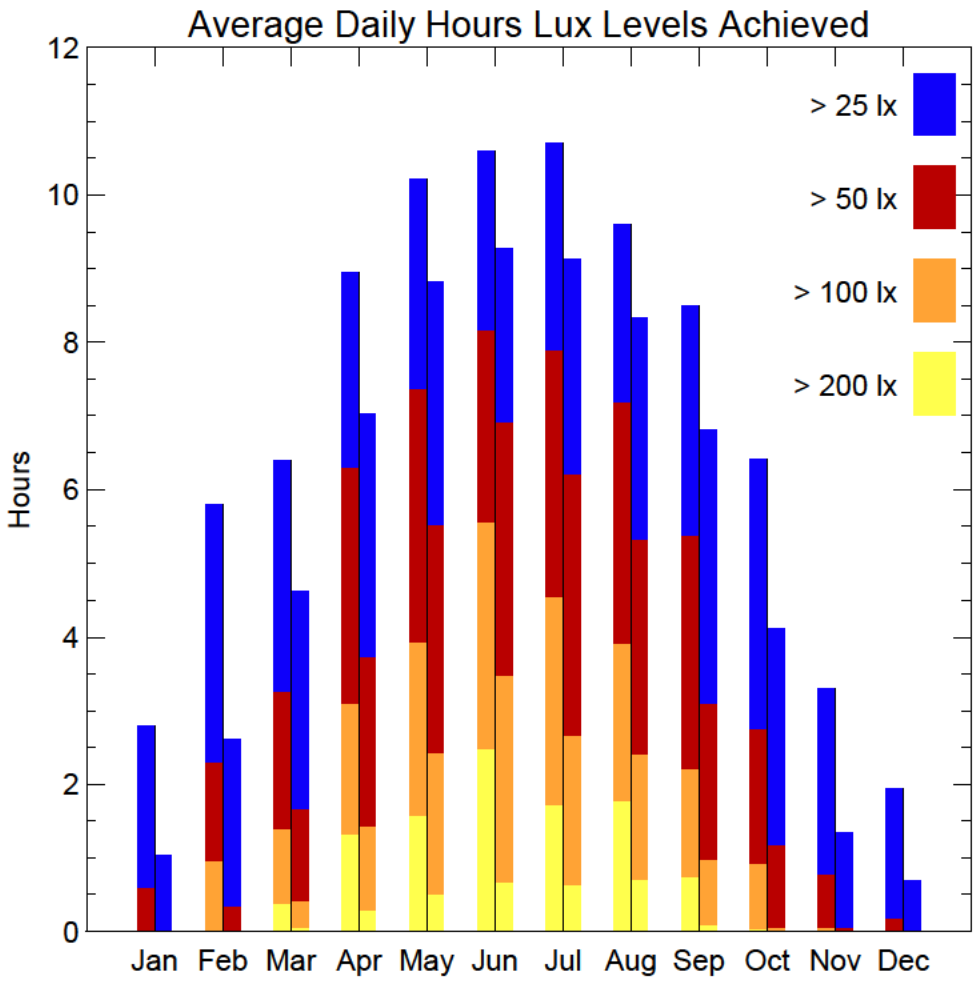


Figure 3: Typical daily hours lux levels achieved. Monitoring period 26th February 2022 to 2nd April 2024

2.4 The Importance of Reflected Sunlight

It was revealing to compare the measured internal illuminance values with simultaneous data for the sun and sky conditions at the same location. The external condition data used were global horizontal irradiation, diffuse horizontal irradiation and beam normal irradiation at 15 minute intervals for the entire monitoring period to date. The global and diffuse horizontal irradiation data were sourced from the Copernicus Atmosphere Monitoring Service (CAMS). This service provides freely available satellite-derived radiation data covering Europe, Africa, the Middle East and parts of South America at various time resolutions. The period of record is February 2004 to the present day (with up to two days delay). CAMS satellite irradiation data has undergone numerous validation studies and shown to be a reliable indicator of conditions on the ground.[4,5]

CAMS irradiation data for the precise latitude/ longitude coordinates of the Synagogue were

[4] German Salazar et al. "Solar irradiance time series derived from high-quality measurements, satellite-based models, and reanalyses at a near-equatorial site in Brazil". In: *Renewable and Sustainable Energy Reviews* 117 (2020), p. 109478.

[5] Laurent Vuilleumier et al. "Accuracy of satellite-derived solar direct irradiance in Southern Spain and Switzerland". In: *International Journal of Remote Sensing* 41.22 (2020), pp. 8808–8838.

downloaded from the Solar Radiation And Meteorological Data Services website.[6] The CAMS irradiation data for the duration of the monitoring period (26th February 2022 to 2nd April 2024) were converted to illuminance values using the Perez luminous efficacy models. Global horizontal illuminance (GHI) is a measure of the total light from the sun and sky received by an (unobstructed) horizontal surface. Diffuse horizontal illuminance (DHI) is the same as global horizontal illuminance but excluding the contribution of solar radiation. When the two quantities are plotted, the amount by which GHI is greater than DHI indicates the degree of sunniness. A bell-shaped curve for GHI indicates largely clear sky conditions throughout the day. If however the lines of GHI and DHI overlap (i.e. when GHI equals DHI), this indicates that the sky at that time was largely overcast with no significant solar contribution, i.e. GHI ≃ DHI. The beam normal illuminance (BNI) is a measure of the direct sun intensity measured normal to the direction of the sun. The BNI can often exceed GHI on clear days at times when the sun altitude is low – and thus its contribution to horizontal illuminance is small compared to its intensity measured normal to the beam.

Our use of the CAMS-derived illuminance data is illustrative. However, examination of the correspondence between the internal daylight levels and the (external) illumination levels confirmed our hypothesis that reflected sunlight makes a significant contribution to the daylight inside the Synagogue. And also that the effect is important throughout the year. An example plot of the data collected on 8th May 2022 is used to illustrate the substantial contribution of reflected sunlight to the internal daylight levels in the synagogue, Figure 4. The red and the blue lines show the illuminance measured at points BM1 and BM2, respectively, at 5 minute intervals. The time axis shows GMT.

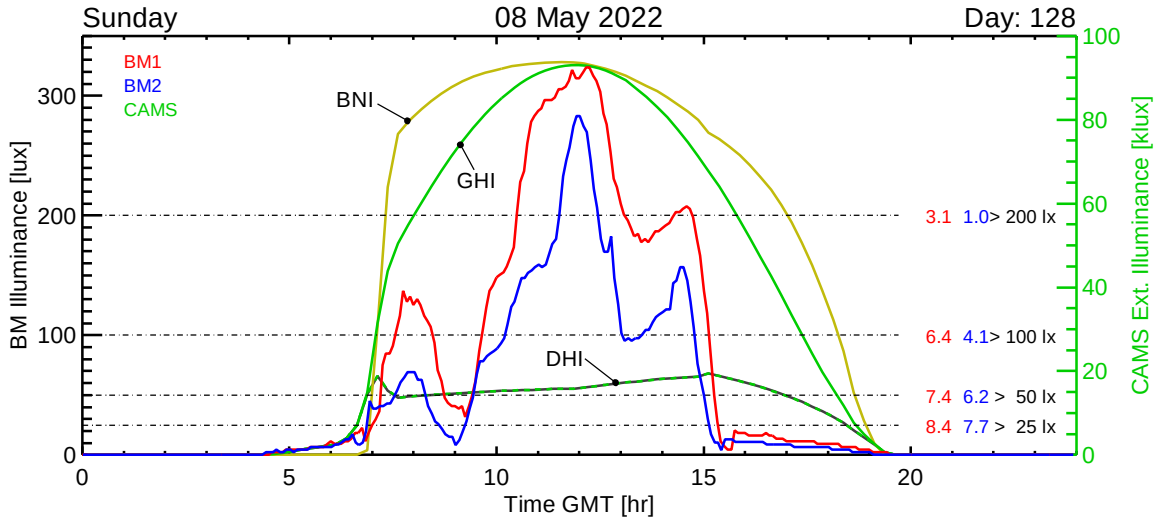


Figure 4: Example data plot for 8th May 2022. The external sun and sky conditions-derived from satellite data-are indicated by the green and yellow lines. The solid green line shows the global horizontal illuminance (GHI), and the dashed green/grey line shows the diffuse horizontal illuminance (DHI). The yellow line shows the beam normal illuminance (BNI).

For this bright day, the maximum recorded illuminances were ~320lux (BM 1) and ~280lux (BM 2), at the same time around 12:00. The key illuminance values are indicated by horizontal dashed lines. The CAM S-derived external illumination data is over-plotted using the same time axis, however the scale used is now the right-hand y-axis in green, with units of klux, i.e. thousands of lux. For this day, The peak GHI (and, coincidently, peak BNI) were both ~95klux (i.e. ~95,000lux) around noon. W hereas DHI (the illuminance from the sky only on

[6] https://www.tsv.soda-pro.com

thehorizontal) was ~20,000lux. Thedata showsthat thiswasa largely clear, sunny day with just a small degree of cloud around dawn (07:00). All 767 daily plots of illuminance measurements in the Synagogue showing also the satellite-derived external illuminance conditions are presented in Appendix B of the report.[7]

A conspicuous feature evident on many of the sunny days (see Appendix B) is a large dip in both internal light level readings around 08:30 to 10:00, followed by another rise. This distinct dip is quite broad (lasting approximately two hours) and does not result from reduced external irradiation – GHI is steadily increasing until around noon. Instead, it is evident that this feature results from the progression of the path of the sun and its interaction with the surrounding buildings. It appears that, on this day from around 06:00 and until 08:00, the Synagogue receives reflected sunlight from the surrounding buildings. Then, between 08:30 and 09:30, the reflected sunlight decreases to a minimum because the sun is being blocked by a nearby surrounding building – One Creechurch Place (~80m tall from ground level). Thereafter, when the sun has progressed past the obstructing building, the reflected sunlight increases as rapidly in the next hour as it declined in the previous hour. Such a persistent feature cannot be explained by random variations such as cloud patterns, etc.

This assertion is confirmed by examining the internal illuminance plot (Figure 4) alongside simulated time-lapse images for that day which show the progression of sunlight and shadow around the immediate vicinity of the Synagogue. The illustration given in Figure 5 shows renderings of the shadow patterns for the hours 08:00, 09:00 and 10:00.[8] These renderings reveal the important contribution of reflected light from the immediate surroundings to the daylight levels in the Synagogue. At 08:00 the shadow cast by One Creechurch Place has begun to encroach on the Synagogue courtyard, and the measured daylight levels begin to decline steeply. At around 09:00 the shadow cast by One Creechurch Place results in the maximum reduction in daylight levels recorded at both locations in the Synagogue: below 50lux for BM1 and below 25lux for BM2. At 10:00 the shadow cast by One Creechurch Place begins to recede from the courtyard, and the illuminance levels measured in the Synagogue begin to rise steeply, eventually attaining values around 300lux each.

The example above showing the overshadowing effect of One Creechurch Place on daylight levels in the Synagogue can be used to illustrate the likely effect that (proposed building) 31 Bury Street would have on Synagogue daylight levels on a similarly clear day during the middle of the year. The illustration is shown in Figure 6 using the same presentation to that employed for One Creechurch Place. For 31 Bury Street, its shadow would begin to encroach on the Synagogue courtyard area around 11:00, and between 12:00–13:00 the courtyard area is heavily shaded. By 14:00 the shadow from 31 Bury Street has largely receded from the Synagogue courtyard area. The illuminance plot used previously is repeated, but now the likely effect on the measured daylight levels at BM1 and BM2 (caused by 31 Bury Street) has been illustrated by superposing on the BM1/ BM2 lines 'best guess' estimates indicating how they might change – magenta curve for BM1, cyan curve for BM2. The *actual* degree of light reduction could be less or greater than that shown – but, given the similarities with the example of One Creechurch Place, it is likely to be of that order. The same data for BM1 and BM2 are shown disaggregated (with the less significant details removed) in Figures 7 and 8, respectively.

The contribution of reflected sunlight might appear to be a subtle aspect of the daylight dynamics in the Synagogue. However, it is revealing of a wider reality that the *prevailing* (i.e. yearly) daylight in Bevis Marks depends overwhelmingly on reflected sunlight and skylight from nearby building surfaces. Consequently, any reduction of the daylight provision in the Synagogue that might result from additional overshadowing can therefore only be assessed using a computer simulation technique that accounts adequately for reflected sunlight and skylight.

[7] Note, two versions of the report have been prepared: with and without the 64 pages containing the 767 daily plots.

[8] The shadow pattern images were generated using the VuCity software and supplied with permission for use by HGH Consulting.

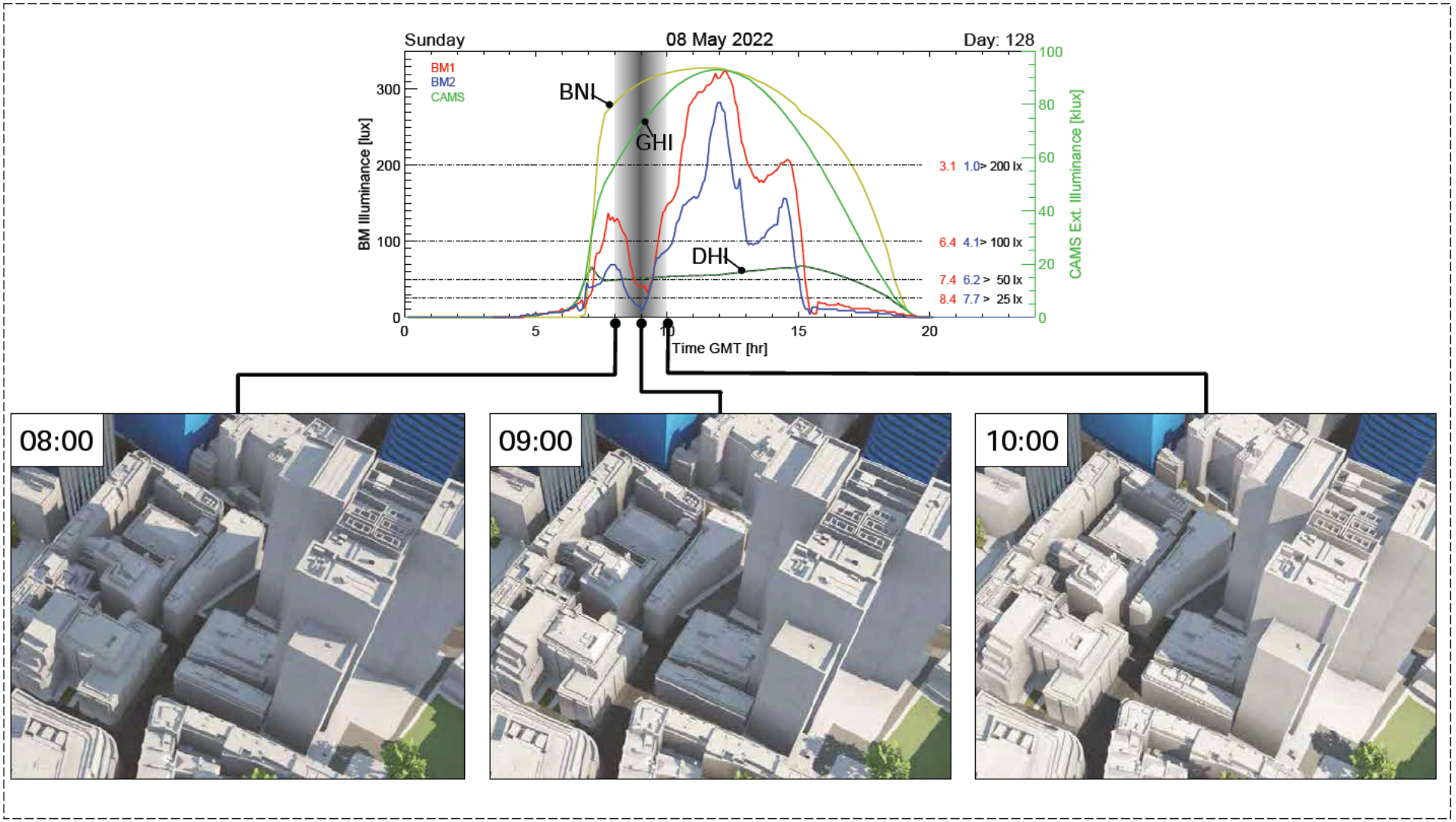


Figure 5: Renderings showing the progression of shadow cast by One Creechurch Place on Bevis Marks for a clear sky day (8th May) between the hours 08:00 and 10:00 (GMT). The significant effect of the overshadowing on measured Bevis Marks illuminance levels is readily apparant.

Cannon-Brookes Lighting & Design
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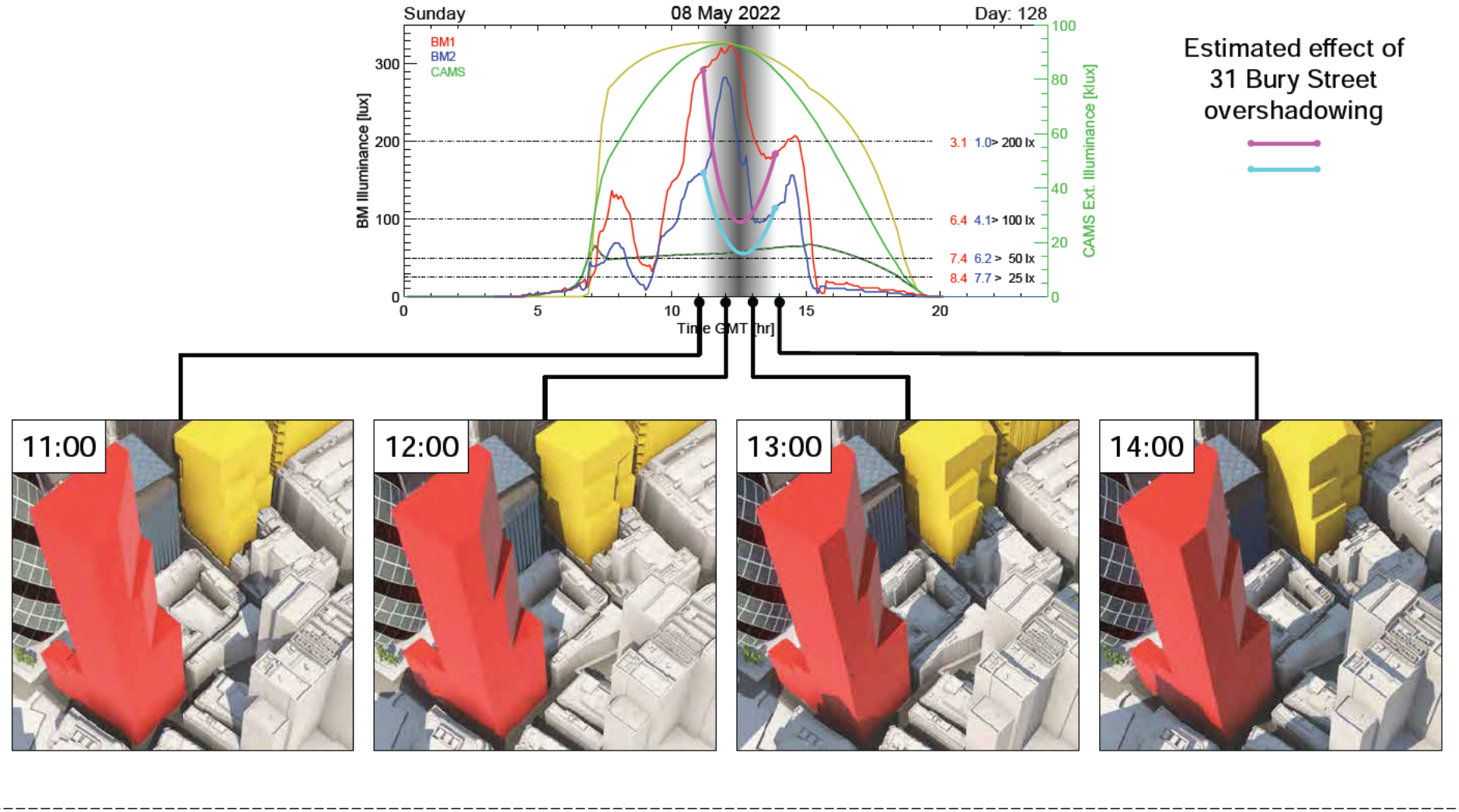


Figure 6: Renderings showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT), and estimated likely reduction in measured Bevis Marks daylight levels caused by the overshadowing on such a day.

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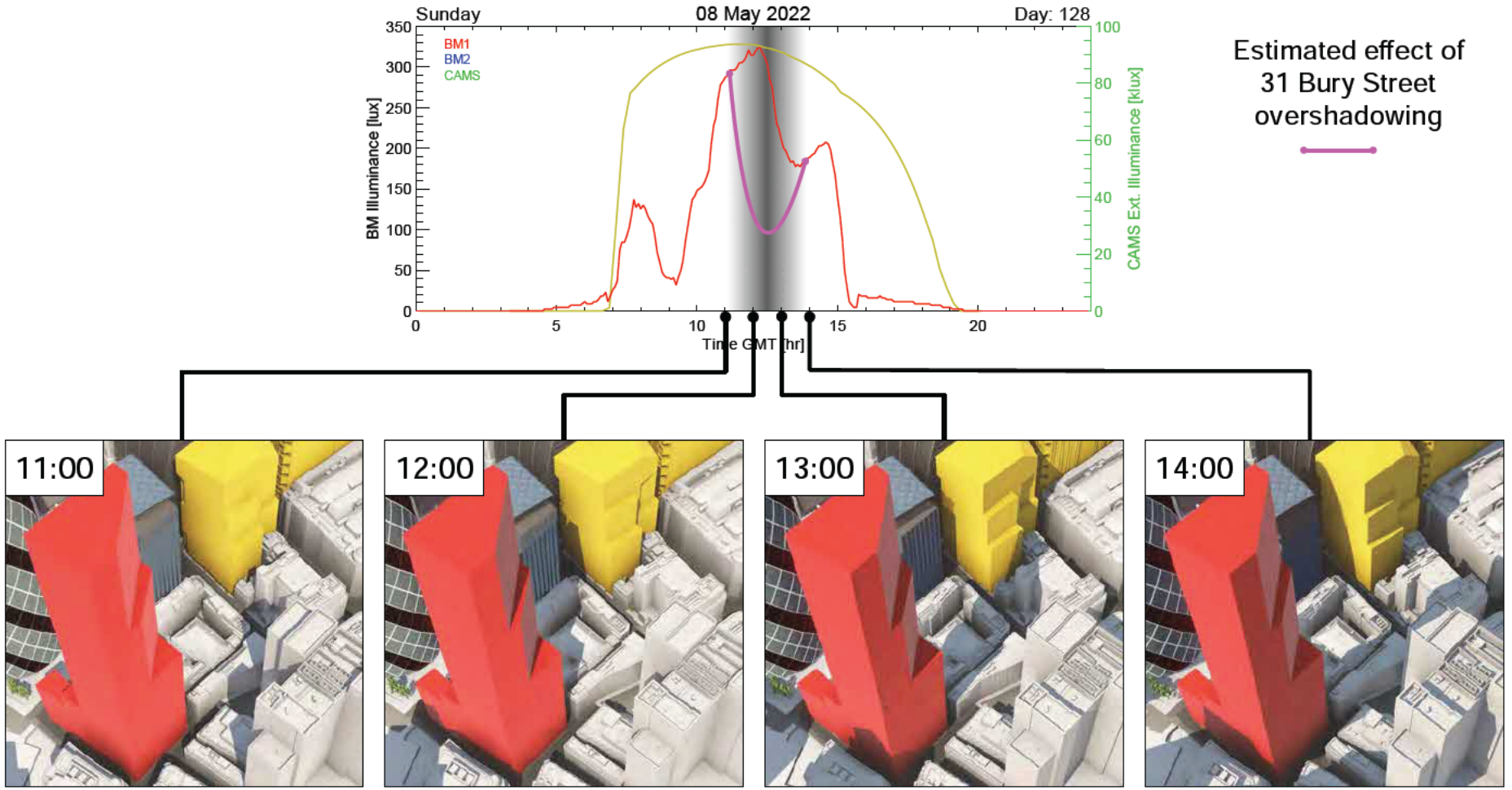


Figure 7: Data from Figure 6 focussing on illuminance at BM1. Renderings as before showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT).

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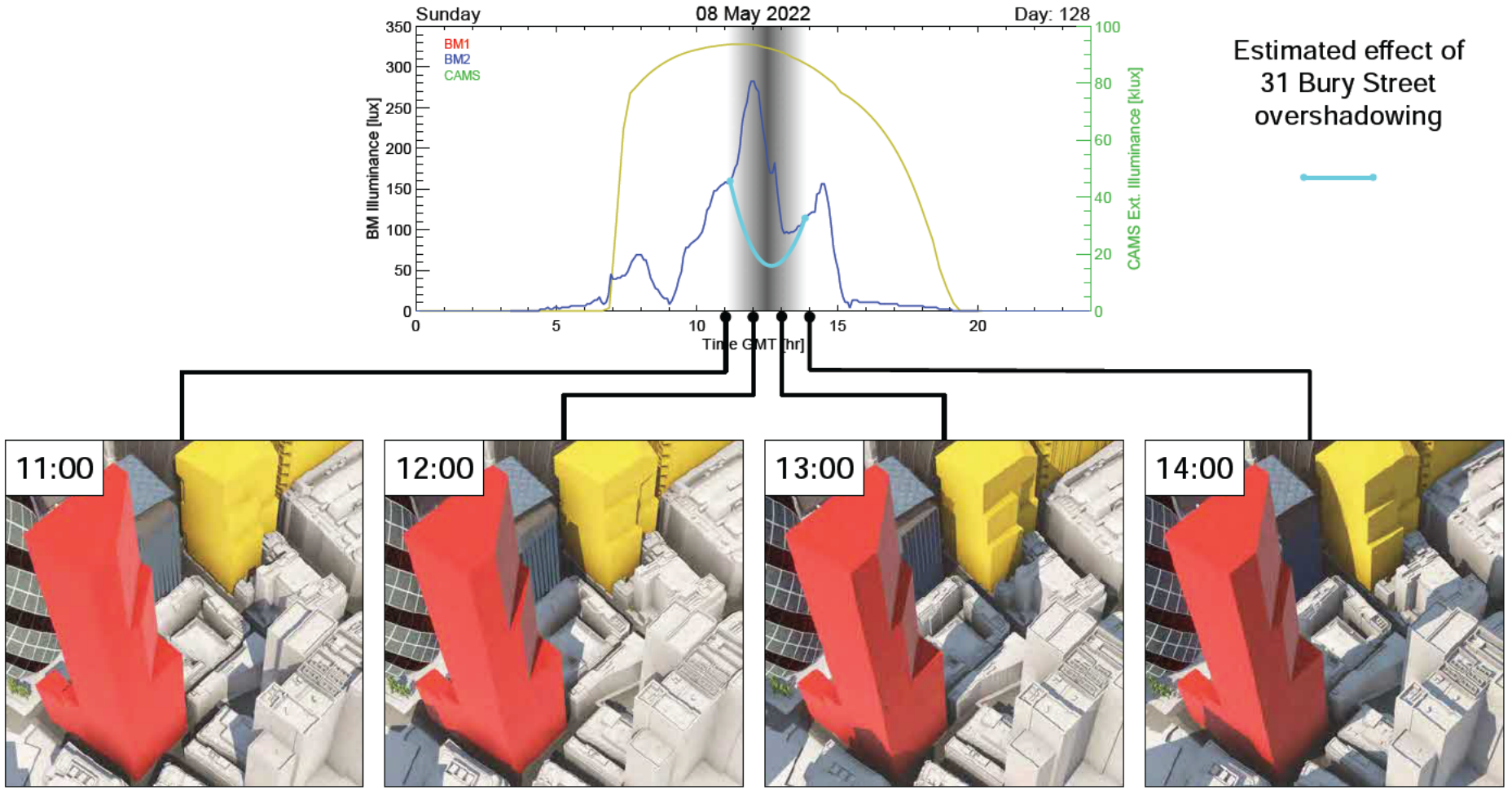


Figure 8: Data from Figure 6 focussing on illuminance at BM2. Renderings as before showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT).

Cannon-Brookes Lighting & Design
Daylight-Experts.com

3 Predicting Daylight Levels in Bevis Marks

As noted in the Executive Summary, the reduction in daylight provision to the Synagogue caused by any proposed development(s) can only be estimated using a realistic prediction method which minimises uncertainty in the outcome. In other words, the prediction method used must be able to faithfully model the prevailing nature of the daylight levels experienced by the occupants of the synagogue – and as proven by direct measurement.

Commonly used prediction methods employed by surveyors at the planning stage do not model actual daylight levels, i.e. illuminance lux levels. Instead, they model various proxies of daylight provision under enormously simplified conditions. For example, a single unchanging sky condition (uniform or standard overcast brightness pattern) with no contribution from sunlight. These methods do not predict absolute levels of illuminance (e.g. as measured in the Synagogue), instead they predict percentage ratios. The basis and intrinsic limitations of these methods are described in Appendix A.

3.1 Climate-Based Daylight Modelling

In the mid to late 1990s, Mardaljevic developed and validated a daylight simulation approach that would later become known as Climate-Based Daylight Modelling, or CBDM.[9,10] The CBDM 'engine' developed by Mardaljevic was founded on the *Radiance* Lighting Simulation System.[11] Although lacking a formal definition, CBDM is widely taken to be the prediction of any luminous quantity (illuminance and/ or luminance) using realistic sun and sky conditions derived from standardised climate data, i.e. hourly annual weather files. Thus, CBDM predicts annual profiles of absolute quantities, such as illuminance, which are directly comparable to what can be measured in buildings. For example, with a suitably detailed 3D model, it would be possible to predict daylight levels at points in the Synagogue, and then process the annual simulation data to produce plots of daylight provision similar/ identical to that shown in Figure 3.

The widespread adoption of the *Radiance* lighting simulation system[12] and, ultimately, CBDM was due in part to the outcomes from validation studies which demonstrated quite remarkable prediction accuracy, e.g. within ±10% of measured values.[13] Around this time, the accuracy of physical scale models for daylight assessment was called into question, with validation studies showing large discrepancies between illuminances measured in a scale model and the full-size building under the same conditions.[14] CBDM as a tool for practical application steadily gained traction during the first decade of the millennium. Landmark projects such as daylighting the New York Times Building[15] and the Central Park Tower daylight injury evaluation[16] (also in New York) helped to demonstrate the potential of this powerful new technique.

In 2013 the UK Education Funding Agency (EFA) made CBDM a mandatory requirement for the evaluation of designs submitted for the Priority Schools Building Programme (PSBP). School designs submitted to the PSBP must achieve certain 'target' criteria for the useful daylight illuminance metric. This was believed to be the first major upgrade to mandatory daylight

[9] J. Mardaljevic. "Simulation of annual daylighting profiles for internal illuminance". In: *Lighting Research and Technology* 32.3(2000),pp.111–118.

[10] Working independently and a little later, Christoph Reinhart also developed a similar technique, but with a different formulation and, arguably, less rigorously validated.

[11] G.W ard Larson et al. *Rendering with Radiance: The Art and Science of Lighting Visualization*. San Francisco: M organ Kaufmann, 1998.

[12] Ibid.

[13] J. Mardaljevic. "The BRE-IDMP dataset: a new benchmark for the validation of illuminance prediction techniques". In: *Lighting Research and Technology* 33.2(2001),pp.117–134.

[14] S. W. A. Cannon-Brookes. "Simple scale models for daylighting design: Analysis of sources of error in illuminance prediction". In: *Lighting Research and Technology* 29.3(Sept.1997),pp.135–142.

[15] J.M ardaljevic, L.Heschong, and E.Lee. "Daylight metrics and energy savings". In: *Lighting Research and Technology* 41.3(2009),pp.261–283.

[16] J. Mardaljevic, G. M. Janes, and M. Kwartler. "The 'Nordstrom Tower': A landmark daylight injury study". In: *CIE 28th Session, Manchester, UK* (2015).

requirements since the introduction of the daylight factor more than half a century ago. In the US, a climate-based daylight metric approved by the IESNA has appeared in the latest version of LEED. The 2018 European Standard for Daylight in Buildings (EN 17037) is the first major standard where the basis for daylight assessment is founded on the annual occurrence of absolute measures of illuminance.[17] This marked a step-change from the traditional daylight factor approach. To assess the daylighting performance of a building design against EN 17037 criteria, the evaluated spaces are rated in terms of the spatial extent and the (CBDM predicted) degree of occurrence of target illuminance values as a fraction of the daylit year.

3.2 Outline CBDM Evaluation of Bevis Marks

In September 2021 we carried out climate-based daylight modelling (CBDM) simulations of an approximate scenario based on the Synagogue and its current surroundings. A 3D model of the Synagogue was created based on detailed drawings, and the nearby buildings estimated to create a simple 'massing' model for the surroundings. The 3D model therefore should be considered to be an approximation until a 3D laser scan of the Synagogue is carried out and a detailed massing model acquired. Accordingly, the CBDM results generated using this 3D model should be considered as illustrative until more accurate building geometry is available. Nevertheless, we believe the 3D model is sufficient to reveal 'broad brush' characteristics of the daylight illumination in the Synagogue. More importantly, the findings support our assertion that the methods commonly used to assess daylight provision in buildings – both for rights of light and planning – are not applicable for the particular case of Bevis Marks because they cannot adequately reveal the *actual* degree of daylight loss resulting from the proposed developments. The rationale for our assertion – given below – necessitates an appreciation of the distinction between directly received light (from the sun or sky) and indirectly received light, i.e. that which arrives from the sun or sky following multiple reflections.

The quantity referred to here as the total annual illumination (TAI) is a measure of all the daylight illumination received at a point in a building for a period of a full year. It is a useful summary metric since it reveals the totality of daylight illumination – from the sun and sky – over a representative period of a full year. Total annual illumination is one of the many metrics that can be predicted using CBDM to indicate the daylighting performance of a space. The CBDM formulation used here is a research-grade daylight simulation tool developed by Mardaljevic and known as the 4 Component Method (4CM). This tool is widely regarded to be the most rigorously validated of all daylight simulation tools, and so serves as a benchmark to assess the accuracy of other CBDM formulations. The 4 Component Method is called so because it predicts, at a point in a space, the total daylight in terms of its four components:

i. Direct sun – light that arrives directly from the sun (usually through a window).
ii. Indirect sun – light from the sun that arrives following one or more reflections, usually from both external (e.g. surrounding buildings, ground, etc.) and internal surfaces (e.g. walls, ceilings, etc.).
iii. Direct sky – light that arrives directly from the sky (usually through a window).
iv. Indirect sky – light from the sky that arrives following one or more reflections, usually from both external (e.g. surrounding buildings, ground, etc.) and internal surfaces (e.g. walls, ceilings, etc.).

Analysing the CBDM predictions for TAI in terms of the four components can, depending on the scenario, greatly enhance the understanding the importance of the various light transfer mechanisms, and how they contribute to the light experienced by the occupants of a building.

The TAI predictions for the core of the Synagogue revealed that around ~1% of the daylight received over a full year was that arriving directly from the sky, no direct sunlight at all was received. Thus, ~99% of the daylight illuminating the core of the synagogue is light from the sun

[17] European Committee for Standardization. *EN 17037:2018 - Daylight in Buildings*.2018.

and the sky reflected off adjacent buildings. Of the reflected light illuminating the core of the Synagogue, about 3/5 iscomprised of reflected skylight and theremaining 2/5 by reflected sunlight. We would expect a fully detailed 3D model to give some variation in the relative amounts of the illumination components. However, even if the total of the direct components were predicted to be several times greater, say, 5%, it would not alter the key finding that daylight illumination is dominated by *reflected* light – originating from the sun and the sky in roughly equal proportions. Note, walking around the core of the Synagogue, at best only tiny slivers of sky are directly visible through the windows. Thus, the potential for direct illumination by skylight is very small indeed, and for direct sunlight it must be negligible/ zero. And since the estimated massing model of the surroundings was partial, it is not improbable that the direct components of total daylight in the core of the Synagogue could amount to even less than the ~1% predicted by the illustrative model.

4 Conclusions

4.1 Daylight Measurement

The following assertions can be made from the daylight monitoring evidence collected between 26th February2022and2nd April 2024:

a) The measured daylight levels support the claim made by the users of the Synagogue that it is experienced as functionally daylit space for the majority of the months of the year.

b) The daylight levels during the winter months, however, are often only barely exceeding the threshold needed to perform visual tasks, e.g. reading, appreciation of the space, etc.

c) The measured data supports our observations from site visits that daylight in the core of the Synagogue is comprised almost entirely of reflected light. Reflected sunlight makes a significant contribution to the prevailing daylight levels in the Synagogue, even on partially sunny days which occur much more often than entirely clear-sky days.

It is reasonable therefore to describe the prevailing daylight provision in the Synagogue at present as being at or very close to a 'tipping point'. Consequently, any additional reduction in daylight provision caused by the proposed developments carries the significant risk that the prevailing daylight levels inside the Synagogue could be pushed beyond this 'tipping point', with the Synagogue ceasing to be a *functionally daylit* space.W erethattohappen,itcouldprofoundlyaffect thecharacter,perception and useofthespace–bringingintoquestion thecontinued survival oftheonly Synagoguein Europetohaveheld regularservicescontinuously formorethan 300 years.

4.2 Daylight Prediction

Theevidencecollected during themonitoring campaign clearly demonstratesthat theonly way to reliably predict the daylight loss due to proposed developments is to use Climate Based Daylight Modelling (CBDM). In contrast to the traditionally used methods (see Appendix A), CBDM has the potential to reliably predict the totality of daylight illumination – including the important reflected sun and sky contributions – over representative periods of at least a full year.

Statement of Compliance and Declaration

The authors of this report have prepared it in compliance with norms expected for an expert witness, including possible use of the material in court:

I. We confirm that our report includes all facts which we regard as being relevant to the opinions which we have expressed, and that attention has been drawn to any matter which would affect the validity of those opinions.

II. We confirm that our duty to the Court (should it become a legal matter) as expert witness overrides any duty to those instructing or paying us, that we have understood this duty and complied with it in giving my evidence impartially and objectively, and that we will continue to comply with that duty as required.

III. We confirm that we are not instructed under any conditional fee arrangement.

IV. We confirm that we have no conflicts of interest of any kind other than those already disclosed in my report.

V. We confirm that our report complies with the expected norms for academic practice with regard to acting as Expert Witness.

VI. We confirm that, insofar as the facts stated in our report are within our knowledge, we have made clear which they are and we believe them to be true, and that the opinions we have expressed represent our true and complete professional opinion.

VII. We aware of the requirements of CPR Part 35, practice direction 35 and the Guidance for the Instruction of Experts in Civil Claims 2014.





Prof. John Mardaljevic

Dr. Stephen Cannon-Brookes

24th October 2024

Appendix

A Critique of the Waldram and Daylight Factor Methods

The following contains material from two peer reviewed articles:

- P Tregenza and J Mardaljevic. "Daylighting buildings: Standards and the needs of the designer". In: *Lighting Research & Technology* 50.1(2018),pp.63–79
- J.M ardaljevicand J.Christoffersen."'Climateconnectivity'in thedaylightfactorbasis ofbuildingstandards".In: *Building and Environment* 113(2017),pp.200–209

A.1 Waldram, Trotter and the daylight factor

Quantitative measures of daylighting provision evolved from the methods devised in the 19th century to determine some objective basis for the degree of daylight injury (that is, reduced daylight illumination) caused to an existing space by the introduction of some obstruction, e.g. a new building. The Prescription Act 1832 provides for the creation of a right to light where light has been enjoyed for the period of 20 years before a claim to the easement is made.[18] Once a right to light (with regard to a particular window) is determined to exist, the owner of the right is entitled to *"sufficient light according to the ordinary notions of mankind"*. Whilstthe1832 Actessentiallyenshrined in Common Law thenotion ofa'righttolight',thedetermination of whatconstitutesan *"ordinary notion"* of sufficiency was, initially, largely a matter of judgement supplemented by rough rules of thumb such as the 45° rule, i.e. the vertical angle of sky visible at the centre of the window. The attempts to systematise the assessment of daylight injury date back to at least 1865.[19]

In the 1920s, Percy Waldram determined what was intended to be a precise and objective measure of an *"ordinary notion"* of sufficiency for daylight illumination. This was based on measurements of daylight illumination in buildings combined with subjective determination of sufficiency by a jury of experts. From this study, Waldram determined the so-called "grumble point", i.e. the point in a space at the boundary between sufficient and insufficient daylight from a window. The "grumble point" was defined in terms of the illumination received at that boundary as a percentage of the unobstructed horizontal illumination from a notional average (assumed uniform luminance) sky. The percentage value at the "grumble point" was determined by Waldram's jury to be 0.2%. For practical application of Waldram's "grumble point" in 'rights of light' disputes, surveyorscommonly apply the"50/ 50 rule" to determineif a spaceisadequately daylit, i.e. no more than half of the space at table-top height should receive less than 0.2% of the sky illumination. Additionally, the percentage value is referred to as the sky factor since, for evaluation purposes, it is a measure of the illumination on a horizontal surface resulting from any direct view of a uniform luminance sky, expressed as a percentage of the horizontal illumination from an unobstructed view of the sky. Neither reflected light nor attenuation from any glazing are accounted for in the 'rights to light' schema.

Whilst Waldram's work is widely credited as providing the basis for the daylight factor, it appears that the idea of using a ratio between inside and outside was first proposed in 1895 by Alexander Pelham Trotter (1857–1947).[20] Theoriginsofthedaylightfactor(DF)areactually somewhathazy sincetheredoesnotappeartohavebeen aseminalpaperintroducingtheap-proach.Thereferencetoitsintroductionin1895appearstobeanecdotalandrecalledanumber ofyearslater.Thedaylightfactorwasconceived asameansofratingdaylightingperformance

[18] ThePrescriptionAct1832."(Regnal.2and3W ill4)".In: *The Stationery Office, London* (1832).

[19] R.M. Kerr. *On Ancient Lights: And the Evidence of Surveyors Thereon : with Tables for the Measurement of Obstructions*.J.M urray,London,1865.

[20] J. A. Love. "The evolution of performance indicators for the evaluation of daylighting systems". In: *Industry Applications Society Annual Meeting, 1992., Conference Record of the 1992 IEEE* (1992), 1830–1836 vol.2.

independently of the actually occurring, instantaneous sky conditions. Hence the daylight factor DF was defined as the ratio of the internal horizontal illuminance E_{in} to the unobstructed (external) horizontal illuminance E_{out}, usually expressed as a percentage:

$$DF = \frac{E_{in}}{E_{out}} 100\% \quad (1)$$

However, the external conditions still need to be defined since the luminance distribution of the sky will influence the value of the ratio. At the time that the daylight factor was first proposed it was assumed that heavily overcast skies exhibited only moderate variation in brightness across the sky dome, and so they could be considered to be of constant (that is, uniform) luminance. The assumption of a uniform sky is, of course, in keeping with the notion of rating the performance independently of sky conditions. In the second half of the 20th Century the daylight factor formulation switched from using the uniform sky to the CIE Standard Overcast Sky.

A.2 Absolute and relative values of illumination

In a 1937 paper P. J. Waldram claimed that: *"The eye is affected by ratio only, and is scarcely aware of huge variations in amount."*.[21] The evidence for this was based on an assessment of the daylight adequacy of 20 spaces carried on both a "bright day" and a "dull day" by a 'jury' of six members (i.e. the data used previously to determine the "grumble point"). Waldram's claim appears to have become the foundation for what is now an 'article of faith' among stanumber of practitioners, i.e. that there is no need to make any consideration of absolute values – the daylight factor ratio is all that is required. Waldram's assertion and the evidence in support of it were examined in a 1955 CIE paper by R.O. Phillips.[22] Phillips notes that:

> *If this investigation did, in fact, support the view that the daylight factor is more important than the actual illumination in determining the adequacy of the lighting, then the values of the daylight factor determined would be substantially the same on both types of day. If on the other hand, it is the illumination which is the more important, a higher value of the daylight factor would be required on a dull day that on a bright one.*

The original report of the 'jury' findings presented by Waldram included the curve shown in Figure A1. This was intended to "*summarise the results concisely and to deduce a figure of daylight factor which may fairly be said to represent the average opinion of the observers*".[23] Phillips decomposes this curve into the data taken on the bright and dull days respectively. They clearly show different distributions, with a marked preference for a higher daylight factor value on a dull day compared to a bright one: the means were 0.20% (dull day) and 0.09% (bright day). Applying a paired *t*-test on the data, Phillips notes that: "*Since such a value could only arise by chance once in several millions of cases, the hypothesis that there is no difference must logically be rejected*". In short, Phillips' analysis of the data makes the convincing case that, contrary to Waldram's assertion, the subjects were in fact expressing a preference for adequate absolute daylight levels rather than relative ones (i.e. daylight factors).

Phillips' paper is potentially of great significance since it offers a robust challenge to a rarely unquestioned assertion that has long been held as a fundamental tenet of daylighting design/ evaluation. That is being so, a question presents itself: why has this paper been consigned to near-obscurity? This finding from the Phillip's paper is included here because Waldram's assertion has been so influential that it has framed much of the development of methodologies for the evaluation and testing of daylight performance in spaces. In particular for the case of

[21] P. J. Waldram. "Measuring and predetermining daylight illumination". In: *The Builder* (1937), p. 598.

[22] R. O. Phillips. "An historical outline of the concepts and terminology of daylight". In: *Proc. CIE v2, Zurich, Switzerland* (1955).

[23] Ibid.

Bevis Marks, the preference for *higher* levels of absolute illumination (say, 100lx rather than 25lx) would appear to be in accord with what was *actually* determined by Waldram's 'jury'.

It needs to be recalled that, at the time that Waldram's jury carried the assessments, notions of illumination adequacy were very different from what they are today. However, that consideration does not alter the significance of Phillips' re-evaluation of the Waldram study. This and related studies by Waldram also serve as the basis for the "rights to light" schema devised for the determination of daylight injury. In recent years the methodology employed by Waldram has been severely critiqued in a number of papers.[24,25,26,27]

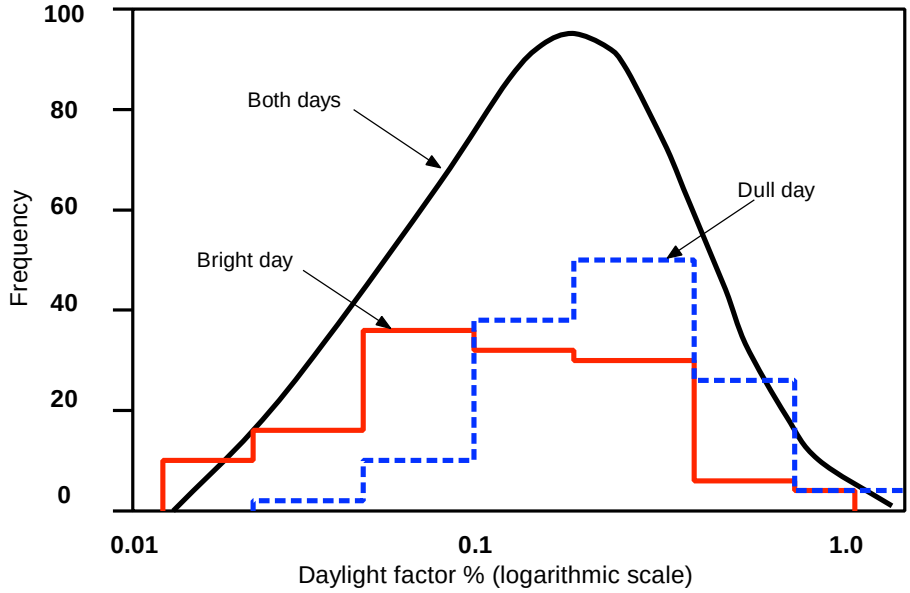


Figure A1: Distribution of preferred daylight factor values (after Phillips R. O. Phillips. "An historical outline of the concepts and terminology of daylight". In: *Proc. CIE v2, Zurich, Switzerland* (1955))

B Daily Plots of Illuminance Data

DESCRIPTION ONLY – SEE COMPLETE REPORT FOR THE DAILY PLOTS

Appendix B presents all 767 complete days of monitoring data recorded between 26th February 2022 and 2nd April 2024 by logging meters BM1 and BM2. Data are presented where there is a complete day for either one or both of the meters. For the first period of monitoring, 26th February 2022 to 7th June 2022, the contribution of electric lighting used by contractors during maintenance work was subtracted from the values recorded by BM1 and BM2. For the remaining period, it can be seen that a number of days show the small contribution (~10lux) of electric lighting at various times. This will have a small effect (i.e. slight 'uplift') on the results presented in Section 2.

As described in Section 2.4, the plots also contain illustrative external illuminance conditions (GHI, DHI and BNI) derived from satellite remote sensing.

[24] P. Chynoweth. "Progressing the rights to light debate – Part 1: a review of current practice". In: *Structural Survey* 22.3(2004),pp.131–137.

[25] P. Chynoweth. "Progressing the rights to light debate: Part 2: the grumble point revisited". In: *Structural Survey* 23.4(2005),pp.251–264.

[26] Paul Chynoweth. "Progressing the rights to light debate: Part 3: judicial attitudes to current practice". In: *Structural Survey* 27.1(2009),pp.7–19.

[27] P. Defoe and I. Frame. "W as W aldram wrong?" In: *Structural Survey* 25.2(2007),pp.98–116.

Appendix 2 - Response to GIA Lunar Study

the S&P HARDI community Bevis Marks





Planning application ref. 24/00021/FULEIA; proposed 43 storey tower at 31 Bury Street

Response to the Lunar Transit Study and Additional Information produced by GIA

14 November 2024

Rabbi Shalom Morris

Rabbi, Bevis Marks Synagogue

PhD Candidate, King's College London, Dept of History

Introduction

This note sets out the findings of a review of the ‘Lunar Transit Study’ and ‘Additional Information’ produced by GIA (12 Sept and 17 Oct respectively). It is beyond the scope of this report to consider the validity of the data provided by GIA. However we reserve the right to later interrogate this data in more detail, should this be necessary.

Our review of the data provided found that significant harm will come to the Bevis Marks Synagogue should the planning application be approved.

GIA’s report attempts to demonstrate that the harm caused to the Bevis Marks Synagogue would be negligible. However, this conclusion does not stand up to scrutiny in light of the nature of the Kiddush Levana ritual. The fundamental point is that the prayer is recited once each month after nightfall, when the waxing moon is visible. While GIA’s findings give the impression of negligible change in the current conditions, this outcome is rooted in their considering the impact of the proposal on views of the moon throughout the entire lunar transit, from moonrise to moonset, over an eighteen year cycle.

GIA’s 'wide-net’ analysis not only skews their results, it also fails to consider the month on month practical impact of the proposed tower on the ability of the community to worship, which would be significant. The proposed tower would lead to the cessation of the synagogue’s ritual several months a year, and further degrade the community’s ability to worship in the remaining months.

This determination has been corroborated by the BRE’s independent review of the GIA report (commissioned by City of London Corporation, 4 Nov)) and will be referred to in further detail in our conclusion.

We therefore ask that officers carefully consider the analysis presented below when considering this application, taking special account of the equality impacts of it on the Jewish community.

Rabbi Shalom Morris

Bevis Marks Synagogue

14 November 2024

Kiddush Levana

What follows in this section is a description of the:

1.Kiddush Levana prayer and ritual.

2.What is unique about its recital in the traditions of Bevis Marks Synagogue.

3.How the ritual has been recorded and altered in Europe, highlighting:

1.The relationship between the ritual and synagogue.

2.The impact of unpredictable climactic conditions.

Kiddush Levana in Judaism

Judaism's calendar is lunar, linking Jewish practices and festivals each month throughout the year to the moon's cycle. The appearance the new moon is:

1.Anticipated with a prayer on the Sabbath prior (Kiddush Hahodesh)

2.Celebrated upon its return (Rosh Hodesh)

3.Marked with a prayer of renewal (Kiddush Levana)

Kiddish Levana is Hebrew for 'Sanctification of the Moon,' and is a prayer recited each month by Jews. The prayer is a call for renewal, hence the link to the new moon which is becoming increasing visible during this part of the month. Therefore, the prayer is said when the waxing moon in visible in the night sky, commonly from day 3 to 15 of thus he lunar cycle.

The prayer is recited whilst standing outside, under an open sky, and requires sight of the moon. If the moon is blocked by either buildings or clouds, the prayer cannot be recited. However, if the moon is visible through a cloud, one can still recite the prayer.

Kiddush Levana takes about fifteen minutes to recite. It is typically recited following the evening service at a synagogue, so that it can be said with a prayer quorum. It is ideally also recited on a Saturday night when the congregation is still wearing their Sabbath finest.

Kiddush Levana is only recited from day ten in the Hebrew month of Av (typically July/ August), and from the 11th in Tishri (typically September/October), on account of the mourning/repentance that takes place during the first days of those months. This is because the prayer is meant to be recited whilst in a joyous spirit. In contrast, as the prayer is considered to be a petition, it is generally avoided on the eves of Sabbaths and Festivals when petition prayers are considered inappropriate.

Kiddush Levana at Bevis Marks Synagogue

Kiddush Levana has been practiced in the Bevis Marks Synagogue community since the 1600s. Evidence of this can be found in several Jewish sources.

1.Rabbi Jacob Sasportas, first rabbi of the London community (1663), writes of the practice in his Responsa *Ohel Yaakob* (67).

2.The prayer is included in the first Hebrew/ English Spanish & Portuguese (Sephardi) prayer book published by Alex Alexander in England in 1772 (pg 202).

3.David Aaron de Sola, reader of the Bevis Marks Synagogue congregation, includes the prayer in his 'Book of Blessings' published in 1829.

4.Rabbi Shemtob Gaguin, Chief Judge of the Spanish & Portuguese Jewish community in London includes discussions of the community's Kiddush Levana traditions in his work 1934 Keter Shem Tob (Vol 2.)

There are several particular traditions in Bevis Marks Synagogue with respect to Kiddush Levana. These peculiarities reinforce the risk posed to the congregation's unique cultural heritage should a development be approved that interferes with the community's worship.

1.At Bevis Marks Synagogue Kiddush Levana is *ideally* said from day seven of the lunar cycle until the middle of the month, as the moon is giving off more light in the second quarter of its cycle than it does at day 3, thereby giving more meaning to the prayer of renewal. See *The blessings, or, Expressions of praise and thanksgiving said by all Israelites on various occasions with an interlineary translation* published in 1829 by Bevis Marks Synagogue minister David Aaron de Sola (page 83). This is in accordance with the ruling of the authoritative R Yosef Karo (Shulhan Arukh), who along with the rest of the Iberian Jewish community was expelled from Spain in 1492. When climactic conditions are difficult, it is permitted to recite even from day 3.

2. Furthermore, in departure from other Jewish communities, there are nuances to the liturgy of the prayer, as well as the absence of certain mystical repetitions. See *Keter Shem Tob* by Rabbi Shemtob Gaguine, chief judge of the of the London Spanish & Portuguese Jewish community in the first half of the twentieth century (Part 2:1). This reflects the authentic Iberian tradition of Sephardi Judaism that is preserved at Bevis Marks Synagogue.

3. Finally, in the tradition of Bevis Marks Synagogue the prayer is called 'Birkat Levana', the 'Blessing of the Moon', and not 'Sanctification' or 'Kiddush' as it is more commonly called.



Germany 1726
Georg Puschner from Kirchners Judisches Ceremoniel

Kiddush Levana in European History

The peculiarity of this Jewish tradition caught the attention of European observers of Judaism during the early modern era. This can be seen in both visual and literary depictions. Indeed, the European context also influenced the practice and meaning of this ritual.

As stated above, the Kiddush Levana prayer is typically recited following the evening prayers whilst standing outside of the synagogue. This is depicted in historical drawing and prints of the ritual being performed in Europe in the seventeenth and eighteenth century, the years when Bevis Marks Synagogue was established. This reflects the relationship between the prayer and synagogue.



1695 Amsterdam
Haggadah

Literary observers of Judaism also recorded the tradition. The following account by English Christian religious writer John Allen in his 1816 work *Modern Judaism; or a Brief Account of the Opinions, Traditions, Rites, and Ceremonies of the Jews in Modern Times*, depicts the ritual with scorn (pg 379).

'On the first Saturday evening in the month, if the moon is then visible, or on the first evening after, when the sky is bright enough to have a clear view of her, the Jews assemble in the open air, for what is called "the consecration of the new-moon:" when some grave rabbi pronounces the following. benediction, in which he is joined by all the company…'.

Furthermore, the variability of weather patterns in Europe, became a central to the relationship of European Jews to the meaning of the prayer. For European Jews, cloud cover, a common concern, was seen as a bad omen, whilst a clear night was considered a positive sign, as the prayer for renewal could then be recited.

Finally, proximity in the northern hemisphere has made the recital of 'Kiddush Levana' notoriously difficult in locations like England during July and August with it short summer nights and associated lower arc of the moon.

The GIA Report

GIA's report was carried out on behalf the applicant to consider the impact of the proposed redevelopment on the synagogue's worshipping community's ability to recite the monthly prayer Kiddush Levana which requires sight of the moon. The report considers views of the moon from two positions, N and P, as well as during both the major and minor lunistices.

In analysing the data, GIA concludes that at the current baseline the synagogue only retains views of 2.2% of the lunar arc during a major lunistice. With the proposed building and previously approved buildings, this would decrease to 1.3%. These numbers take into account average atmospheric conditions which include cloudy skies. Slight variations to these results based upon major or minor lunistices and position P or N can be found in GIA's Table 01.

This note questions the data assumptions used by GIA to reach their percentage conclusions, the relevance of climatic conditions in their analysis, and mostly importantly considers the overall impact on ability of the community to continue to recite the Kiddush Levana prayer.

Climate Conditions

The Kiddush Levana prayer can only be recited when the moon is visible. Therefore, if obstructed by clouds or buildings, the prayer cannot be recited. Based upon the website https:// weatherspark.com GIA reported (pg 7) that London has cloudy conditions 58% of the time. As a result, they conclude that while in position N the moon should be visible 5.1% of the time, in practice this is likely to only be the case 2.2% of the time.

This conclusion is not robust. In practice cloud is not a "black or white" matter. Sometimes clouds are patchy; sometimes the moon can be seen behind a veil of cloud; furthermore, climate change is a dynamic and present consideration. In contrast, buildings are fixed. In other words, sometimes it is cloudy, sometimes it is not, but once a building is constructed, for all intents and purposes it becomes perpetually 'cloudy' with respect to the lunar visibility. The possibility of cloudy skies should therefore not be considered relevant when considering the impact of perpetually reducing lunar views. A comparison may be made with trees: in planning, trees are disregarded when visual impacts are assessed, because they are impermanent.

Beyond this, the variability of climate conditions themselves plays an important role in the Kiddush Levana ritual. Jews go outside after dark to see whether or not the moon is visible, whereupon a cloudy sky is considered to be a bad omen, and a clear sky a positive one, as it allows for the prayer to be recited. The fixed reduction of visibility by the proposed tower would be a permanent obstruction, removing this variability which is central to the meaning of the ritual.

Furthermore, as reciting the prayer takes approximately a quarter of an hour, the preservation of sufficient unobstructed sky allows for the possibility that any cloud cover will pass, thus enabling the prayer to be recited despite earlier cloudy conditions. This would not be the case should the view be obstructed by a permanent building.

GIA Percentages

GIA concludes (pg 37) *'Additional obstructions in the Future Baseline and Cumulative scenarios will lead to a small absolute reduction in visibility of the lunar bracelet*.' This conclusion, without critiquing the method of analysis itself, is highly misleading. The data provided allows for different percentage conclusions to be reached, depending on which data is considered. In GIA's instance, they've stated (pg 3): '*In order to capture all possible lunar position across the sky, a period of 18.6 years has been studied. This is the length of time needed to conclude a full lunar cycle. All possible locations of the moon's passage have been captured within a lunar bracelet depicted in the sky (see* fig *.1). Once the obstructions already visible from the Synagogue's courtyard are considered, once the passage of the moon during daylight hours are discounted, and the probability of cloudy skies taken into account, the opportunities to see the moon's passage to recite "Kiddush Levana" are limited to 2.2% of the time over 18.6 years*'.

In other words, GIA's percentages are based upon all potential visibility of the moon over the horizon throughout the night sky during this 18.6 year window. In very few settings would the moon ever remain visible constantly throughout this time as any buildings, or landscape features, would reduce this visibility. Of greater consequence is consideration of the amount of time the moon is visible over the Bevis Marks Synagogue, and what impact would the proposed tower have on it.

In this respect, according to GIA the reduction from the current baseline to the future conditions, would be a decrease of 41% - nearly half - marking a very significant reduction in lunar visibility for the synagogue community.

Level of Obstruction

GIA state "*During a minor lunistice, the opportunities of seeing the passage of the moon above the Synagogue are further reduced to 1.8% of the lunar bracelet, owing to the lower transit of the moon in the sky. This means that the passage of the moon will not be visible above the Synagogue's sky, for most months each year.*"

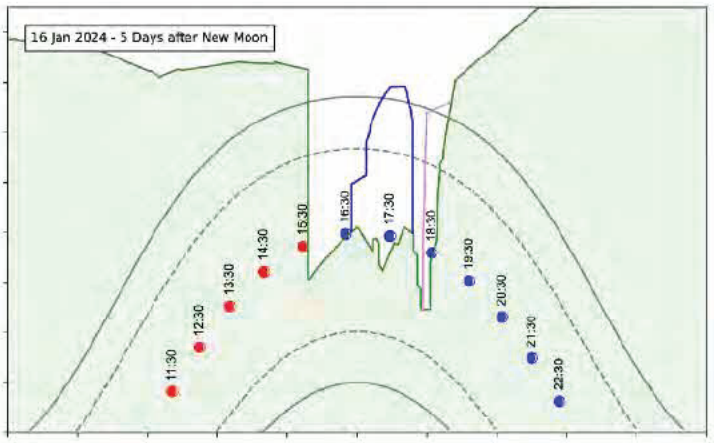
GIA furthermore claim "*during each observation period, the lunar transition will be remain observable, assuming that it would have been in the Baseline scenario, even with the consented 100 Leadenhall and the proposed 1-4, 31-34 Bury Street in place.*"

Both of these claims are unsupported by the data provided (daily graphical representations of the moon passage set against the backdrop of proposed and approved buildings, as made available in their "Additional Information", see Appendix-1 below, and graph to the right). According to GIA's own data, the moon is visible over Bevis Marks Synagogue most months of the year. Furthermore, should the proposed tower be approved, the moon would not be observable in the night sky for at least 3 months a year, when it is currently visible. This is the case in May, June and September during both major and minor lunistices. In some instances it would no longer remain visible in April and October either. During a minor solstice, the reduction of lunar visibility caused by the proposal would be even more dramatic owing the the lower amounts of current visibility.

Furthermore, even during the months when the moon would remain visible, the proposed tower would reduce the numbers of days, and hours in those days, when the moon is visible in the night sky. In some months it would reduce it to one or two days, when the possibility of cloudy conditions would then have a significant impact on the ability to recite the prayer anymore in those months, particularly as the remaining hours of visibility will be quite brief, at times not even long enough to recite the prayer or to make it unlikely to perfectly time a service to ensure visibility.

This point has been born out in the BRE review which found that even in months when some moon views remained, these were of extremely short duration (thirty minutes over two days). This would render the ability and likelihood of being able to recite the Kiddush Levana as improbable, and as such the proposed tower would result in a scenario even those months as akin to blocking out the moon completely.

In this regard, the proposed tower, would result in a quantifiable reduction in the community's ability to worship. Assuming the prayer can currently be recited on average 10 months a year, and in the proposed conditions at most 6 months a year, and more likely only 4 or 5 times, the impact of the proposal would result in a considerable reduction in worship of 40% to 60% of the time.





Conclusion

GIA mischaracterises the negative impact of the proposed tower by casting a wide net of data points, which present a skewed picture of the current ability of the community to worship, and the degree of harm it would experience should the scheme be approved. In practice, the proposed tower would reduce overall visibility of the moon from the current baseline by 40%-60%. GIA acknowledge a 40% loss.

The data provided by GIA though makes it clear that in absolute terms, the proposed tower would reduce the ability of Bevis Marks Synagogue to worship as it has since 1701 by at least 3-5 months per year, causing a reduction in the times the community can worship of 30%-50%, possibly even by 60%.

The BRE report corroborates this conclusion. 'With both the consented and proposed developments in place (in the cumulative scenario), the opportunity to view the moon from the observer location used by worshippers at Bevis Marks Synagogue when reciting Kiddush Levana would reduce by 51% on average throughout a full lunar cycle, compared to the existing baseline.

According to the BRE, 'Based on the results reported in the GIA lunar transit study…the relative reduction in the hourly visibility of the lunar bracelet from the Synagogue courtyard would be significant with the proposed development in place'.

It is clear then that the proposed tower would cause significant harm to the historic community of Bevis Marks Synagogue. The proposed tower would undermine its centuries-long history of worship on this site, and their ability to maintain of their unique Spanish & Portuguese Jewish traditions.

Put into heritage terms, the planning system is concerned with the *significance* of heritage assets. The sky view as an entity of cultural/ religious importance in Judaism is surely a very important contributor to the Synagogue's significance as a working synagogue. This is made all the more significant as Bevis Marks Synagogue is likely the only one in the world in continual use dating back to 1701, and is the oldest synagogue in the UK. Hence, if these sky views are severely impaired, not only does our minority community suffer damage to our culture, but the heritage asset (the Grade-1 Listed Bevis Marks Synagogue) loses significance. This is in addition to the substantial loss of significance in conventional heritage terms.



Kiddush Levana, 14 Nov 2024



Image of proposed tower blocking out essential clear-sky backdrop

Appendix 1 - Month on Month Analysis of Lunar Visibility in Number of Visible Days

P Major

Month	Current Days	Projected Days	Percent Loss
January	11	8	27.2727272727273
February	11	8	27.2727272727273
March	10	8	20
April	8	4	50
May	4	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	4	2	50
November	4	3	25
December	8	6	25
Total	63	39	38.0952380952381

P Minor

Month	Current	Projected	Percent Loss
January	11	8	27.2727272727273
February	11	8	27.2727272727273
March	10	7	30
April	6	3	50
May	4	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	3	1	66.6666666666667
October	5	3	40
November	7	4	42.8571428571429
December	9	7	22.2222222222222
Total	68	41	39.7058823529412

N Major

Month	Current	Projected	Percent Loss
January	11	7	36.3636363636364
February	12	8	33.3333333333333
March	11	6	45.4545454545455
April	6	2	66.6666666666667
May	4	0	100
June	1	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	3	0	100
November	5	2	60
December	7	4	42.8571428571429
Total	61	29	52.4590163934426

N Minor

Month	Current	Projected	Percent Loss
January	11	7	36.3636363636364
February	12	5	58.3333333333333
March	10	4	60
April	6	0	100
May	3	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	5	0	100
November	6	3	50
December	8	5	37.5
Total	64	24	62.5

Appendix 3 - Letter from Professor Barry Stiefel

COLLEGE of CHARLESTON
DEPARTMENT OF ART AND ARCHITECTURAL HISTORY

Hgh Consulting
45 Welbeck Street, London W1G 8DZ

11 November 2024 / 10 Heshvan 5785

Subject: The Effects of Tall Development Too Close Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue

Dear Bella Tidswell and Rabbi Shalom Morris,

This letter is in response to your correspondence from 8 November 2024 / 7 Heshvan 5785 regarding the significance of the sky view from Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, a Grade I listed building. This is of consequence, considering that the congregation's Hebrew name, Qahal Kadosh Sha'ar ha-Shamayim, translates as the Holy Congregation of the Gates of Heaven. Visual access to the heavens is thus of great importance in the deliberations regarding compliance with the National Planning Policy Framework regulations, especially paragraphs 205 and 206.

The moon, stars, and sun hold significant cultural and religious importance for Sephardic Jews, as they do for many Jewish communities, with Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue being an epitomic example as the oldest Jewish congregation in the British Isles. To begin with, the Jewish calendar is primarily lunar, meaning it is based on the cycles of the moon. This affects the timing of Jewish holidays, including Passover, Sukkot, and Rosh Hashanah. The sighting of the new moon is particularly important as it marks the beginning of a new month (Rosh Chodesh). Sephardic Jews, like other Jewish communities, recite a special series of blessings called Kiddush Levana. This blessing is said once a month, typically after the appearance of the new moon but before it reaches its full phase. It is a moment of reflection and gratitude for the natural world and its cycles.

In Jewish mysticism (Kabbalah), the moon often symbolizes the *Shekhinah*, the divine presence. The phases of the moon can represent different spiritual states and the relationship between the divine and the Jewish people. Historically, the observation of celestial bodies was crucial for navigation and agriculture. For Sephardic Jews, who have lived in various parts of the world, from the Iberian Peninsula to North Africa and the British Isles, understanding the stars and the moon was essential for daily life and survival. Some Sephardic communities have unique customs and traditions related to the moon and stars. These might include specific prayers, songs, or rituals that have been passed down through generations. For Sephardic Jews, the stars in the sky hold both practical and symbolic significance. Historically, stars were essential for navigation, especially for Sephardic Jews who navigated across the British Atlantic World and beyond. The stars helped determine directions and seasons, which was crucial for travel and agriculture. Stars are often seen as symbols of God's creation and the vastness of the universe. They remind

the Jewish people of their place in the cosmos and the greatness of the Creator. The stars are mentioned in various parts of the Torah and other Jewish texts. For example, God's promise to Abraham that his descendants would be as numerous as the stars in the sky (Genesis 15:5) is a powerful symbol of continuity and divine blessing.

In some Sephardic traditions, specific prayers and blessings are associated with the stars. These practices can vary by community but often include expressions of awe and gratitude for the natural world. In Kabbalistic thought, stars can represent spiritual entities or forces. They are sometimes seen as channels through which divine energy flows into the world. Certain Jewish holidays and rituals are tied to the appearance of stars. For example, the end of Shabbat is marked by the appearance of three stars in the sky, signaling the beginning of a new week.

The sun also holds significant religious, cultural, and practical importance for Sephardic Jews. The sun's cycle dictates the timing of daily prayers. For example, the Shacharit (morning prayer) is recited after sunrise, and the Mincha (afternoon prayer) is said before sunset. The sun's position helps structure the rhythm of daily religious life. The setting of the sun marks the beginning and end of the Sabbath (Shabbat) and Jewish holidays. Shabbat begins at sunset on Friday and ends at sunset on Saturday, making the sun's cycle integral to these observances. Once every 28 years, a special blessing called Birkat Hachama is recited to thank God for the creation of the sun. This rare event is a significant moment of reflection and celebration in the Jewish calendar. The sun is often seen as a symbol of God's power and the light of divine wisdom. It represents the consistency and reliability of God's presence in the world. Historically, the sun was crucial for agriculture, which was a central part of life for many Sephardic Jewish communities. The sun's light and warmth were essential for growing crops and sustaining life. Some Sephardic traditions have specific customs and rituals associated with the sun. These might include prayers or blessings said at sunrise or sunset. In Kabbalistic thought, the sun can represent various spiritual concepts, such as the divine light that sustains the universe. Its daily journey across the sky is seen as a metaphor for spiritual enlightenment and the journey of the soul.

Regarding Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, blocking out the sky with new development (even partially) could pose several problems for Sephardic Jews, given the cultural and religious significance of celestial objects:

1. **Interference with Religious Observances**: The sighting of the moon is crucial for marking the beginning of new months and for reciting the Kiddush Levana blessing. If the sky is obstructed, observing these important religious practices would be challenging.
2. **Disruption of Daily Prayers**: The sun's position is essential for timing daily prayers. Obstructions that block the view of the sun could make it difficult to determine the correct times for Shacharit (morning prayer) and Mincha (afternoon prayer).
3. **Impact on Sabbath and Festivals**: The setting of the sun marks the beginning and end of the Sabbath and Jewish holidays. If the view of the sunset is blocked, it could complicate the observance of these sacred times.
4. **Loss of Symbolic Connection**: The stars, moon, and sun are powerful symbols in Jewish tradition, representing God's creation, divine presence, and spiritual enlightenment. Blocking the view of these celestial bodies could diminish the sense

of connection to these symbols. This is especially crucial for Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, the Holy Congregation of the Gates of Heaven.

5. **Cultural and Historical Disruption**: For Sephardic Jews, who have historically relied on the stars for navigation and timekeeping, obstructing the sky could sever a link to their cultural heritage and historical practices.
6. **Challenges to Mystical Practices**: In Kabbalistic thought, the celestial bodies are seen as channels of divine energy. Obstructing the view of the sky could interfere with mystical practices and the spiritual significance attributed to these celestial objects.

Overall, blocking out the sky with new development could significantly disrupt the religious, cultural, and spiritual practices of Sephardic Jews, making it difficult to maintain their traditions and observances. Therefore, I highly recommend that disruptions to the sky view from Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue be minimized and mitigated as much as possible. Addressing these efforts should be done in consultation as much as possible with the congregation and its spiritual leaders as the law permits. Do let me know if you have any further questions or concerns.

Sincerely,

[redacted]

Barry L. Stiefel, Ph.D.
Professor of Historic Preservation & Community Planning
Department of Art & Architectural History
Jewish Studies Program Affiliate
College of Charleston
stiefelb@cofc.edu

Appendix 4 - Advice from Lord Banner K.C.

Fwd: Bevis Marks Synagogue

1 message

From: **Charles Banner KC** <cbanner@keatingchambers.com>
Date: Fri, 4 Oct 2024 at 12:44
Subject: RE: Bevis Marks Synagogue
To: Roger Hepher <rhepher@hghconsulting.com>
Cc: Bella Tidswell <btidswell@hghconsulting.com>, Rabbi Shalom Morris <rabbimorris@sephardi.org.uk>, Michael Bear> <michael@thebearsinc.com>, Michael Keats <mikeats@eastmountgroup.com>, Tilla Crowne <tilla.crowne@sephardi.org.uk>, Julian Cooper <jc@d-cooper.com>

Dear Roger,

Thank you very much for your message. My starting point for considering your questions is para. 206 of the NPPF, which (giving effect to the Planning (Listed Buildings and Conservation Areas) Act duties), requires a “clear and convincing justification” for any harm to the significance of a heritage asset.

In the circumstances you describe below, and in light of how the proposed development is pitched, it would be amply open to the Council to take the view that the “clear and convincing justification” for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist without (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of harm that would be caused – including viability evidence.

Very best wishes,

Charlie

Lord Banner K.C.

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LinkedIn I Website

I often work late hours and weekends but I do not expect others to: if you receive this message outside normal working hours, there is no need for an immediate response.

Appendix 5 - Advice from Claire Nevin

IN RESPECT OF

BEVIS MARKS SYNAGOGUE

Advice on Equalities Statement for the proposed redevelopment of Bury House

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Introduction

1. In instructions dated 17 October 2024, I was asked by Roger Hepher of hgh Consulting, on behalf of the S&P Sephardi Community at Bevis Marks Synagogue ("**BMS**"), to advise on the Equalities Statement accompanying the live planning application for the proposed redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR (ref. 24/00021/FULEIA) ("**the planning application**"). The purpose of the Equalities Statement is to assist the City of London in discharging its legal duties to consider the equality impacts of the planning application in its role as the planning authority.

2. The planning application and related application for listed building consent were submitted to the City of London in January 2024. The proposed development comprises the demolition of Bury House and construction of a 43-storey tower, the partial demolition of Holland House and Renown House and extensions to both buildings, for office, flexible retail/café and flexible community/education/cultural/amenity uses.

3. I was specifically asked to advise on whether the Equalities Statement is sufficiently detailed on the potential impacts of the planning application on the Jewish community at BMS to discharge the legal requirement for decision makers to have due regard to equality considerations throughout the decision-making process.

4. My advice will first address the factual background, including the circumstances of BMS. I will then set out the legal framework and relevant caselaw governing the assessment of equalities impacts under the *Equality Act 2010* ("**EqA 2010**") followed by my views on whether the Equalities Statement is sufficiently detailed.

5. This advice is my independent and impartial view of the application of the law to the facts of this case. If the S&P Sephardi Community at BMS decides to waive legal advice privilege and put this advice in the public domain, I kindly request that it avoid selective quotation, which may be taken out of context. If the advice is made public, I will not assume liability for any reliance by third parties.

Factual Background

BMS and the Jewish Community

6. BMS dates back to 1701 and is the oldest and most historically significant synagogue in the country, often referred to as the 'Cathedral' Synagogue due to its significance within the Jewish faith. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance and its importance both within the City of London and on a national level is recognised by its Grade I Listed status. This is the highest level of listing, meaning the building is deemed, on a national level, to be of 'outstanding' special architectural and historic interest. Indeed, the Historic England Grade 1 listing notes that the Synagogue's "*little altered state is of exceptional historic interest.*"

7. The Synagogue stands within a courtyard which functions as part of the Synagogue and is of great value to the community as a social and religious space, for gathering before and after services and for holding events. My instructions and supporting documents explain that the unobstructed night sky view from the courtyard serves an important spiritual and ritualistic purpose that is central to Jewish practice.

8. The weekly celebration of the Sabbath does not officially end until the average person can see three medium sized stars in the sky; a ritual that is consciously observed from the courtyard of BMS every week. Members of the congregation at BMS further rely on the appearance of three medium sized stars in the sky to fulfil their daily obligation of reciting the *Shema Yisrael* every evening. Although the congregation may rely on the clock when it is too cloudy to observe the appearance of the three stars, the centuries old practice of observing them from the courtyard is of fundamental importance to religious practice at BMS.

9. Similarly, the beginning of each new Jewish (lunar) month is marked by the appearance of the new moon. Each month, approximately one week after seeing the new moon, the BMS congregation gathers outside in the courtyard to recite a special blessing over the new moon. The permanent obstruction of the night sky view from nearby development would render it impossible to perform the prayers because the moon would no longer be visible from the courtyard for significant periods of time. A key ritual observed at this site for hundreds of years would therefore be permanently lost to the Synagogue community.

10. The sky view is also critical to ensuring that enough daylight reaches the interior of the Synagogue. Adequate natural light is key to religious worship at BMS given the intrinsic nature of reading a large quantity of printed texts to Jewish worship. Adequate light levels must be maintained within the Synagogue for this to continue. The amount of natural light in the Synagogue has already been reduced by the construction of higher buildings in the surrounding area and its status as a listed building greatly restricts the possibility of installing further electrical lighting. I understand from my instructions that any further reduction in natural light would jeopardise the ability of the congregation to read from the printed texts.

11. Furthermore, ample light is crucial to safely carrying out circumcisions at the Synagogue; a practice that has continued uninterrupted at BMS for over three hundred years. My instructions explain that those who conduct circumcisions at BMS have raised concerns that any further reduction to light levels would render it impossible to carry out circumcisions at BMS.

Previous planning decisions

12. In October 2021, the City of London's Planning and Transport Committee refused a previous, similar application by the same applicant (an application for a 48-floor tower at 31 Bury St). The refusal identified two harms. The first was harm to the setting and amenities of Grade-1 listed Bevis Marks Synagogue by reason of the "*overbearing and overshadowing impact of the development on the courtyard of the Synagogue*." The second was harm to the World Heritage Site Tower of London.

13. The main difference between the new planning application and the application that was refused in October 2021 is a reduction in height of 19m and two high-level setbacks. BMS considers these modifications to be of little consequence given that the proposed development would be 178.7m high in any event. However, the newly designated Creechurch Conservation Area, within which BMS and the proposed development site at Bury Street sit since its formal designation in January 2024, is a key difference.

14. In November 2021, the Secretary of State refused permission for the 'Tulip' skyscraper in the City of London. BMS was amongst the heritage assets considered in the decision, with the Secretary of State finding that the setting of BMS is "*largely limited to what can be experienced from within its courtyard*" and the "*wider setting*" of the Synagogue "*includes a number of office towers, visible from the courtyard*." Regarding BMS and a number of other heritage assets, the Secretary of State remarked that the Tulip would "*cause a marked exacerbation in the existing harm from tall buildings to the setting of the assets and the ability to appreciate their architectural or historic significance. The effect would be variously to create an overbearing presence from within the curtilage of the heritage asset (…)*" (in relation to BMS).

The City Plan 2040

15. The City Plan, which was submitted for examination on 29 August 2024, sets out the City Corporation's vision, strategic objectives and planning framework to guide future development and decision-making in the City of London to the year 2040. Inspectors have been appointed to carry out the examination but the dates for examination have not yet been published.

16. The City Plan proposes to include the Synagogue within the Tall Buildings Area and remove the current presumption against tall buildings in the Conservation Area. It further proposes to protect only the "immediate setting" of the Synagogue. Weight is of course a matter for the decision-maker. However, given the draft City Plan is still in the relatively early stages of the decision-making process, it should be given no more than limited weight by the Committee when it comes to decide the planning application.

BMS' objection to the planning application

17. In May 2024, BMS submitted a detailed, 33-page objection to the planning application describing the interrelationship between the Synagogue's heritage and religious significance. The main objections included in this letter can be summarised as follows:

    (i) The proposed development would cause substantial harm in heritage terms to the significance of BMS and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

    (ii) The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

    (iii) The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

    (iv) The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Legal Framework

Primary Legislation

18. Section 149 of the EqA 2010 (which is referred to as the 'general equality duty') provides that:

    (1) A public authority must, in the exercise of its functions, have due regard to the need to—

    (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(…)

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(…)

(7) The relevant protected characteristics are—
age;
disability;
gender reassignment;
pregnancy and maternity;
race;
religion or belief;
sex;
sexual orientation.

19. It will be apparent from the above that having "*due regard*" to equalities impacts imposes positive obligations on decision makers to "***advance*** *equality of opportunity*", "***foster*** *good relations*", "***remove or minimise*** *disadvantages*" and "***take steps***" to meet the needs of persons who share a protected characteristic [emphasis added]. It therefore follows that the starting point for decision makers subject to the PSED is to robustly consider the *positive steps* they can take to meet the needs of persons who share protected characteristics, remove or minimise disadvantages etc. It will not be sufficient for the purposes of s.149 to accept harm as a foregone conclusion and then merely

decide on the level of harm that will be acceptable to those sharing a relevant protected characteristic.

Guidance

20. The Equality and Human Rights Commission's 'Technical Guidance on the Public Sector Equality Duty: England' (updated in April 2023) explains at para 2.17 that the public sector equality duty ("**PSED**") "*applies to individual decisions as well as policy formulation (…)*" although "*this does not mean that what the duty requires those exercising the function to do in both these situations is the same. The courts have made it clear that the regard due when exercising a function will depend on the circumstances in which a function is being exercised.*"

21. The Guidance clarifies at para 2.39-2.40 that to 'have due regard' means "*that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the general equality duty (…) How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general duty to the decision or function in question. The greater the relevant and potential impact, the higher the regard required by the duty.*"

22. As to how the different needs of people with protected characteristics might be met when those needs differ from those without them, the Guidance clarifies that the duty is to meet 'needs' rather than any desires or preferences. The need must be intrinsic to the protected characteristic. In the context of the protected characteristic of religion or belief, the Guidance clarifies at para 3.30 that a relevant body "*may have to have regard to meeting needs which arise as a consequence of religious belief, where these arise in the context of a function which they do have*."

23. Complying with the general equality duty in practice entails ensuring a sound evidence base because in order to give proper consideration to the aims set out in the general duty, the relevant decision-making body will need to have sufficient evidence of the impact its policies and practice are having or are likely to have on people with protected characteristics (The Guidance at para 5.15). This entails sufficient understanding of the disadvantages or different needs of people who share a particular protected characteristic.

24. Importantly, it will be necessary to collate relevant information to have evidence-based decision-making and a body subject to the PSED will need to be able to show that it had adequate evidence to enable it to have due regard to its s.149 duty. Para 5.17 of the Guidance states that "*adequate and accurate equality evidence, properly understood and analysed, is at the root of effective compliance with the general equality duty. Without it, a body subject to the duty would be unlikely to be able to have due regard to its aims*."

25. A proper evidence base allows a body to understand the effect of its policies, practices and decisions, to consider whether further research or engagement is necessary, to consider whether there are ways of mitigating any adverse impact identified and decide whether to modify or reconsider a policy, practice or decision (para 5.18 of the Guidance). A relevant body cannot hide behind a lack of evidence or information about a relevant issue to justify not being able to meet the PSED. If the body does not have sufficient evidence to have due regard under s.149, it will need to obtain it (para 5.23 of the Guidance).

Case Law

26. The above principles set out in the Guidance are derived from case law. The seminal cases on the general equality duty are summarised below.

27. In *Hotak v Southwark LBC* [2015] UKSC 30; [2016] AC 811 at [73-76], the Supreme Court identified "*valuable judgments in the Court of Appeal*" explaining what the PSED requires. For instance:

    (i) At [75], the Supreme Court referred to the case of *Bracking v Secretary of State for Work and Pensions [2013] EWCA Civ 1345, [2014] Eq LR 40* which clarifies that the PSED "*must be exercised in substance, with rigour, and with an open mind*" (per Aikens LJ in *R (Brown) v Secretary of State for Work and Pensions [2008] EWHC 3158 (Admin), [2009] PTSR 1506* , para 92).

    (ii) At [75], the Supreme Court further approved the principle set out in *R (Hurley & Moore) v Secretary of State for Business, Innovation and Skills* [2012] EWHC 201 (Admin) according to which, it is for the decision-maker

to determine how much weight to give to the duty: the court simply has to be satisfied that "*there has been rigorous consideration of the duty (…) the court cannot interfere … simply because it would have given greater weight to the equality implications of the decision.*"

(iii) Drawing the threads together, the Supreme Court remarked at [74] that having 'due regard' means take account of what is ""*appropriate in all the circumstances" (…) I do not think it is possible to more precise or prescriptive, given that the weight and extent of the duty are highly fact-sensitive and dependent on individual judgment*."

Advice

The Equalities Statement

28. Taking the above legal framework into account, what counts as 'due regard' for the purposes of s.149 of the EqA 2010 depends on what is appropriate in the circumstances. The extent of the duty is highly fact-sensitive and will change from case to case. However, given BMS' unique status as the oldest and most historically significant Synagogue in the country, its recognition as a 'cathedral Synagogue' with over three hundred years of continuous worship and its Grade I listing that reflects its exceptional heritage value, I consider that an Equalities Statement accompanying a proposed development of this scale would have to demonstrate a sufficient understanding of the specific potential impacts of the development proposal on the Jewish community at BMS.

29. Furthermore, given the positive obligations on decision makers subject to the PSED, the City of London will have to go beyond merely demonstrating an understanding of the religious practices of the Jewish community at BMS to actively considering the positive steps it can take through its decision making functions as a planning authority to meet the needs of those who worship at BMS, remove or minimise disadvantages facing them, foster good relations and advance equality of opportunity.

30. The Equalities Statement notes at paras 3.27-3.28 that 2% of the City of London's residents are Jewish and BMS is one of a number of places of worship in close proximity to the site.

31. BMS is directly addressed from para 3.43 onwards where the Equalities Statement makes the following observations:

    (i) BMS is located approx. 30m north of the site. It is a place of worship and a community facility. It is the oldest Synagogue in the UK and the only Synagogue in Europe to have held regular services continuously for more than 300 years.

    (ii) It notes the times of Shabbat and the fact that the Synagogue is used for various celebrations, as well as the fact that it is of significance to the Jewish community because of its heritage.

    (iii) It remarks that the Synagogue is open to visitors and received a lottery grant in 2019.

32. The Equalities Statement notes in the table at page 19 that impacts of the proposed development may have different impacts on the protected characteristic of religion or belief due to how places of worship are used for religious ceremonies. Specific impacts to BMS are noted from para 4.38 and are said to include:

    (i) **Townscape and visual impact**. The Equalities Statement concludes that the proposed development will alter the visual backdrop to the Synagogue from the courtyard but that this does not impact on the use of the Synagogue or its courtyard for religious activities.

    (ii) **Noise**. However, the Equalities Statement notes that contractors will have close regard to the religious calendar to limit disruption during religious events.

    (iii) **Daylight and sunlight**. The Equalities Statement notes that the Synagogue is sensitive due to the reliance of candlelight only during religious ceremonies where the congregation need to be able to read from the Torah. However, it goes on to note that the Synagogue currently receives very low levels of light. It further states that as the proposed development would lead to a small reduction in the amount of daylight received, it is unlikely to affect the current use of these areas or increase the requirement for artificial lighting.

(iv) **Night sky visibility**. The Equalities Statement addresses the proposed development's potential impact on the ability to observe the night sky during Shavuot, noting that the proposal will not materially affect the ability to observe the night sky from the courtyard. However, the Equalities Statement concludes that high levels of light pollution in London limit the potential for night sky observations.

33. The s.149 duty is primarily one of process rather than outcome ('have due regard'). I therefore consider that the Equalities Statement contains just enough information on the potential daylight and sunlight impacts of the proposed development for the reading of religious texts to discharge the PSED. However, it completely fails to address the potential daylight and sunlight impacts on the ability to continue carrying out circumcisions in the Synagogue. This was raised in BMS' objections so it should have been addressed in an updated Equalities Statement.

34. Concerning the night sky view, the Equalities Statement refers to the potential impacts on the continuing observance of Shavuot but is entirely silent on the importance of the night sky view to the weekly observance of Shabbat, the daily obligation to recite the *Shema Yisrael* and the monthly blessing on the appearance of the new moon. BMS' objection raised these specific points and explained the ways in which the development proposal's obstruction of the night sky view might prevent these religious practices from taking place.

35. Without giving "*rigorous consideration*" to these specific issues, it is hard to see how the Equalities Statement can safely conclude that the recognised alterations to the visual backdrop to the Synagogue from the courtyard would "*not impact on the use of the Synagogue or its courtyard for religious activities*."

36. I consider on balance that the Equalities Statement is not sufficiently detailed on the potential impacts on the Jewish community at BMS to continuing worshiping in accordance with their faith. The failure of the Equalities Statement to address several key aspects of the night sky view and the importance of adequate lighting for circumcisions does not comply with the Guidance and case law which requires the PSED to be "*exercised in substance, with rigour"* (*Bracking*) and "*have regard to*

meeting needs which arise as a consequence of religious belief" (para 3.30 of the Guidance).

37. It is trite that planning authorities must carefully balance different (sometimes competing) factors and decide how they should weigh in the overall balance. However, certain factors will always weigh more heavily in the balance than others. The Guidance clearly states "*the greater the relevant potential impact, the higher the regard required by the duty*." Considering the importance of the PSED and the extent of the potential impacts of the development proposal on the Jewish community at BMS, I consider that this is a case that warrants the heightened regard envisaged by policy and by extension, substantial weight in the overall planning balance.

Statement of Reasons

38. With some exceptions, planning committees are not generally required to give reasons for decisions to grant planning permission. The extent of the duty to give reasons for granting planning permission was discussed in *Dover DC v Campaign to Protect Rural England (Kent)* [2017] UKSC 79; [2018] 1 W.L.R. 108 where the at [59], the Court held *"(…) it should not be difficult for councils and their officers to identify cases which call for a formulated statement of reasons, beyond the statutory requirements. Typically there will be cases where, as in Oakley and the present case, permission has been granted in the face of substantial public opposition and against the advice of officers, for projects which involve major departures from the development plan, or from other policies of recognised importance (such as the "specific policies" identified in the NPPF - para 22 above). Such decisions call for public explanation, not just because of their immediate impact; but also because, as Lord Bridge pointed out (para 45 above), they are likely to have lasting relevance for the application of policy in future cases.*"

39. If the City of London decides to grant planning permission, I consider that such a decision would fall within the categories envisaged by the Supreme Court where a formulated statement of reasons would be required. This is because:

    (i) There is substantial public opposition to the proposals.

    (ii) A very similar proposal was refused in 2021 and the area now enjoys heightened statutory and policy protections due to its recent designation as a Conservation

Area. The proposal is therefore likely to involve major departures from the development plan and other policies of recognised importance.

(iii) Given the City of London's recent decision to refuse a similar application and the recent designation of the Conservation Area, a formulated statement of reasons would be required to explain consistency of decision making.

(iv) The decision would be likely to have both an immediate impact on the Jewish community at BMS (amongst others affected by the proposals) and lasting relevance for the application of policies relating to tall buildings and conservation areas in future cases.

(v) Section 149 contains a positive duty to have 'due regard' to equalities impacts. In the absence of a formulated statement of reasons, it would otherwise be difficult to ascertain whether the City of London complied with this duty.

40. These observations on the duty to give reasons are relevant to understanding how an eventual decision to grant planning permission might be otherwise vulnerable to legal challenge. For the reasons stated above, a complete failure to give reasons in this case could be subject to legal challenge.

41. However, if reasons are given and the committee remedies the inadequacies of the Equalities Statement by robustly considering the specific potential impacts to BMS, it would be hard to argue that the PSED has not been discharged. That is unless the committee nonetheless gives irrational reasons for granting permission (a high hurdle). In any event, even if the committee robustly considers the potential equalities impacts on BMS but nonetheless decides to override the needs of the Jewish community in favour of the development proposal, I am of the view that a clear statement of reasons would be required.

Conclusions

42. My conclusions are as follows:

(i) The Equalities Statement does not comply with s.149 of the EqA 2010 as it does not sufficiently address the potential impacts of the planning application on the ability of the Jewish community at BMS to continue worshipping in accordance with their faith. While it addresses some points (reading religious texts by natural light), it completely ignores several important potential impacts on the ability of the Jewish community at BMS to continuing worshipping in accordance with their faith.

(ii) If planning permission is granted, I consider that a formulated statement of reasons will be required to demonstrate compliance with the PSED.

CLAIRE NEVIN

18 November 2024

Francis Taylor Building

Inner Temple

London EC4Y 7BY

From: Michael Green
To: lpaburystreet
Subject: Objection to Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 19 November 2024 16:00:17

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THIS IS AN EXTERNAL EMAIL

Michael Green
Flat 9, Brunswisk House,
Thurtle Road
London E2 8PJ

Dear Sirs,

As a regular worshipper at Bevis Marks, I would like to reaffirm my objections to the Proposal for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA). For the following reasons.

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.
- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.
- This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

Yours sincerely,

Michael Green

E.J.C. ALBUM, OBE
47 LYNDALE AVENUE, LONDON, NW2 2QB
Tel: [redacted]
Fax:
Mobile

20 November 2024
Your Reference: 24/00021/FULEIA and 24/00011/LBC

Environment Department
City of London
PO Box 270
Guildhall
LONDON
EC2P 2EJ

Dear Sirs,

Re: Town and Country Planning Act 1990

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Planning (Listed Building and Conservation Areas Act 1990

Location: 1- 4 31 – 34 Bury Street London EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1-4, 32 Bury Street, London, EC3A 5AW

I am writing to thank you for your further message on the above subject dated 8October 2024. This message is an additional submission on behalf of Bevis marks Synagogue and follows my earlier letter, as a Consultee dated 21 April 2024. A copy of this letter is attached.

May I make the following additional points:-

1. The objection to the proposed development of a 43 storey tower building at 31 Bury Street is based both on the loss of light that will be caused to the synagogue but also on the overcrowding of the area which will result from the building of the new property, the associated areas surrounding it, and the additional traffic that will be created if the building is occupied. It is, I suggest an overdevelopment in the area. It may not be directly relevant as a planning issue but it is suggested that a new building of this size is not required at the present time and there is or will be sufficient adequate premises available for business users.
2. Bevis Marks Synagogue is part of the heritage and Environment of the City, which is shared with the City Churches, the Tower of London, the Monument and the numerous Banking buildings. It is important for this heritage to be preserved so that the City of London remains an attractive and important business centre.
3. The adverse effect of the development of the Synagogue should be considered in the light of its long history of usage form 1701 and its outstanding and unusual architectural features, including the contribution of members of the Synagogue to the British Armed forces.

Your helpful consideration of the above would be greatly appreciated.

With kind regards.

Yours faithfully

[redacted]

E.J.C. Album

Cc Shalom Morris.

E.J.C. ALBUM, OBE
47 LYNDALE AVENUE, LONDON, NW2 2QB

Tel: [redacted]
Fax:
Mob:
E-mail:

21st April 2024

By e-mail to: anna.tastsoglou@cityoflondon.gov.uk
and by Royal Mail

Planning Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
For the attention of Ms. Anna Tassioglou, Case Officer

Dear Sir,

Re: Development Alongside Bevis Marks Synagogue
Planning Application Reference 24/00021/FULEIA

I am writing with reference to the proposed development alongside the Bevis Marks Synagogue. I understand this comprises a 45 storey building to the south of the Synagogue. We very much hope that this will not be allowed to proceed as we are clear that it will severely limit or indeed eliminate natural light for the Synagogue.

I am a long-standing member of the Spanish & Portuguese Congregation and of the Synagogue concerned, which I attend regularly. I have, in the past been a member of the governing body of the organisation.

We are aware of the initial view that the development would be undesirable but we understand that it is now currently being seriously considered. We are informed that it is a speculative development without a commitment from a potential occupant.

We appreciate that you have to consider the matter in relation to planning policy but we do hope and strongly suggest that this should include the preservation and benefit of a long established building (dating from 1701) and also a long-standing heritage site which is of benefit to the City of London as a whole.

We ask you to consider the matter in broad terms as in appropriate in heritage terms and to bear in mind the interests of the Congregation and Community, the Synagogue having been in continuous use since 1701. May I also include a reference to the external Memorial Plaque showing the substantial contribution of the Community to the World Wars, including a VC awarded in the First World War.

I should appreciate your acknowledgment to this letter and your helpful consideration of this matter.

Yours faithfully,

[redacted]

Edward Album

cc: Rabbi Shalom Morris

From:	Andrea Rosen
To:	lpaburystreet
Subject:	Objection re: 24/00021/FULEIA
Date:	20 November 2024 13:44:13

You don't often get email from andrea.rosen@gmail.com. Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Anna,

Please find my objection below to the scheme at 31 Bury St (24/00021/FULEIA). As I work in mental health, I ask that you withhold my full address from the public record for safety reasons. I'm happy for you to have it for the purposes of submission [redacted] EC3A [redacted]), and to include the first half of my postcode with the objection as I've done below.

Best,
Dr Andrea Rosen

I am writing to express my continued objection to the scheme at 31 Bury St. The additional information provided by the developers does not change the harm this proposed building would cause the Bevis Marks Synagogue, and their continued attempts to minimise this harm and gaslight the Jewish community are frankly abusive and unacceptable. The lunar study provided by the developers has already been contradicted by the City's independently commissioned study, which found the proposed scheme would significantly harm the synagogue's lunar views and ability to worship. This should be case closed, especially as the City has already refused planning permission for essentially this exact same scheme. Continuing to entertain these revised applications is a gross and ongoing betrayal of the Jewish community's trust.

Sincerely,
Dr A Rosen
City resident (EC3A)

CITYSIKHS
www.citysikhs.org.uk

15/11/2024

Planning Officer
Environment Department
City of London
PO Box 270
Guildhall
London, EC2P 2EJ

Dear Sir/Madam,

Re: Planning Application 24/00021/FULEIA (WELPUT: Holland House)

I am writing on behalf of City Sikhs, a leading organisation that supports Sikh professionals across London, providing networking opportunities, cultural engagement, and community initiatives that foster a sense of belonging and diversity. We would like to express our strong support for the planning application for Holland House and believe this development will bring meaningful benefits to the City of London.

A significant aspect of our support stems from the commitment to providing free-of-charge community spaces within the new and existing premises. Like many community organisations, City Sikhs often encounter difficulties in finding affordable venues in the city to host our events, which range from professional development workshops to cultural and social gatherings. This challenge limits our ability to connect with and support our members effectively.

The inclusion of accessible community spaces at Holland House will directly address this longstanding issue. It will allow us to host more frequent and impactful events, benefiting not only our members but also contributing to the cultural richness and inclusivity of the City of London. By enabling organisations like ours to expand our reach and activities, the development will serve as a catalyst for greater engagement and collaboration within the Square Mile.

We believe the proposed Holland House development will become an invaluable resource for fostering connections, promoting diversity, and strengthening community ties. Its potential to serve as a hub for cultural, educational, and professional initiatives aligns closely with the values we champion as an organisation.

We hope the City of London Corporation will appreciate the far-reaching benefits of this proposal and approve the planning application.

Sincerely

[redacted]

Param Singh MBE
Founder and Co-Chair - City Sikhs

http://www.citysikhs.org.uk
info@citysikhs.org.uk

City Sikhs is one of the leading Sikh organisations in the UK. Our mission is to create positive change within society and inspire people to be the best they can be. Registered charity number 1160843.

From: Dalia Halpern-Matthews
To: King, Alastair (Alderman),The Rt Hon the Lord Mayor
Cc: lpaburystreet; manager@bevismarksheritage.org.uk
Subject: Bevis Marks Synagogue; the Equality Act 2010
Date: 21 November 2024 17:50:10
Attachments: Bevis Marks planning objection.docx

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THIS IS AN EXTERNAL EMAIL

Dear Lord Mayor King,

I write, on behalf of Chatham Memorial Synagogue and many or the Jewish community of Kent in grave concern over the threat over the Bevis Marks Synagogue.

This significant and historic site, is pertinent to British Jewry as a whole as the earliest surviving synagogue, operating continually for over 320 years since Jews were newly allowed back into England.

The Bury Street development proposal [24/00021/FULEIA] would cause substantial harm to the Bevis Marks Synagogue and its community. It is one of the most light-sensitive places in London; extensive reading of printed matter in daylight is fundamental to daily worship, and the proposal would have a significant detrimental impact on the community's ability to worship in accordance with our faith.

The view of the passage of the moon is also critical to religious activity, and the proposal would block this critical view.

The Jewish community would be grateful for your support in this matter, and to ensure that the proposals are permanently denied.

Kind regards,

Dalia
Dr Dalia Halpern-Matthews
Creating Cultural Capacities
[redacted]

This communication (and any attachments) contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s) please note that any form of distribution, copying or the use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error please return it to the sender and delete it from your system.
Please note that no warranty can be given that it is free from viruses and you must rely upon your own virus checker.

Chatham Memorial Synagogue

Ms A Tastsoglou,
Planning Department,
City of London
PO Box 270
Guildhall,
London EC2P 2EJ

21st November 2024

Dear Ms Tastsoglou,

Re: Planning application 24/00021/FULEIA Bury House London EC3A 5AR

I am writing on behalf of Chatham Memorial Synagogue and the Jewish community of Kent. We strongly object to the above planning application on the grounds of the negative impact it will have on the Grade I listed Bevis Marks Synagogue (BMS) and the communities who use it.

BMS is the oldest surviving synagogue in the UK, and is the only one which has been continually in use in Europe for over 320 years, since soon after Jews were allowed back into England. It is deeply significant to Jews across the UK, and is deeply resonant of our freedom here.

Any works which impede the use in any way of this significant site are deeply offensive; in particular, the impact of the above development which, through its reduction in natural daylight to the synagogue and courtyard, will disrupt the ability of the synagogue to worship in accordance with our faith.

We believe that this proposal breaches the rights of the Jewish community under the Equalities Act 2010, and sincerely hope that permission is, again refused.

Yours sincerely,

[redacted]

Dr Dalia Halpern-Matthews
Chair of Trustees, Chatham Memorial Synagogue

Chatham Memorial Synagogue,
366 High Street, Rochester, ME1 1DJ | Tel: 01634 847665
www.chathamshul.org.uk | jon@chathamshul.org.uk
Chatham Memorial Synagogue is a registered charity - No. 800902

From: Lois Rayburn
To: lpaburystreet
Subject: Reference 20/00848/FULEIA
Date: 21 November 2024 18:59:53

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THIS IS AN EXTERNAL EMAIL

Writing to voice my vehement objection to the planning application for the Bevis Marks Synagogue.
This synagogue began as a place of worship for London Jews. It is a historically significant building to the Jews.
I have ancestors who attended this synagogue.
The synagogue belongs to my Jewish people.
Please refrain from repurposing its intended function.

Sincerely,
Lois Coriell

From:	Tastsoglou, Anna
To:	lpaburystreet
Subject:	Fw: We are entitled to expect much higher standards from Britain's most prestigious local authority.
Date:	22 November 2024 15:26:21
Attachments:	Outlook-Descriptio Outlook-ktcxuor3.png

Hi,

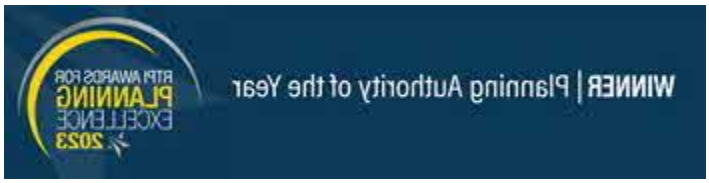
Can the following objection please be uploaded on the file of the application?

Thank you,

Anna

Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
07751 731282
anna.tastsoglou@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment



From: LiLi Jackson [redacted]
Sent: 22 November 2024 3:19 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: We are entitled to expect much higher standards from Britain's most prestigious local authority.

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THIS IS AN EXTERNAL EMAIL

Dear Ana,

I am writing to express my strong objection to the proposed 45-storey development adjacent to the historic Grade I Listed synagogue. This building, of immense cultural and historic importance, would be overwhelmed by the sheer scale and inappropriate placement of the proposed tower.

It is inconceivable that such a structure would be allowed next to St. Paul's Cathedral, yet the synagogue is not afforded the same protections. The development would obliterate the southern sky view, a vital aspect of the synagogue's setting and integral to its religious rituals, including

the observation of celestial events. The resulting overshadowing would render the synagogue courtyard unusable for many rituals and celebrations, while the already limited natural light within the building would be further diminished. Due to the synagogue's historic nature, additional electric lighting is not a viable solution.

This site falls within the Creechurch Conservation Area, where tall buildings are not permitted under current planning policy. The development directly conflicts with the statutory development plan, and the City Corporation’s ongoing work on identifying suitable sites for tall buildings is incomplete and not yet independently assessed. Approving this development ahead of this process would undermine proper planning protocols.

While the developers argue that the project offers planning benefits, these claims do not withstand scrutiny. Features such as being car-free or environmentally sustainable are standard expectations for modern commercial buildings and do not justify the harm to the synagogue. The restoration of Holland House, while welcome, should not be used to justify such an inappropriate scheme, particularly when its purported community benefits are questionable.

Furthermore, the existing building at 31 Bury Street is only 40 years old and capable of refurbishment, avoiding the environmental cost of unnecessary demolition. The proposed tower would also damage the setting of other heritage assets and compromise the character of the Conservation Area as a whole.

It is deeply disappointing that the City Corporation, while claiming to recognise the importance of the synagogue, is facilitating this monstrous development. We are entitled to expect much higher standards from Britain’s most prestigious local authority. I urge you to reject this proposal and protect the integrity of our heritage and planning policies.

Best,

LiLi Jackson

From: Jane Clucas
To: lpaburystreet
Subject: Re: 20/00848/FULEIA
Date: 22 November 2024 18:14:37

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THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I wish to make an objection to the proposed planning application **20/00848/FULEIA.**

Others will have given very good reasons why they object to what has been proposed, my objection really goes to the heart of the matter which is after all these years, where peaceful worship has taken place, in the traditional way (using daylight, and the moon) since 1701 at the Bevis Marks Synagogue, is going to irrevocably ruined.

The idea of blocking out the natural light by some huge building project upsets me more than I can say. It feels like a steamroller, in a blundering, unfeeling way, trampling underfoot something that cannot be replaced. Something that has been sacred for all these years. It cannot be right. The Bevis Marks Synagogue is a very special bailing, it is Grade 1 listed as you know, and in a conservation area. It will not be the same should this project go ahead. It can't be.

Please stop it.
Kind regards,

Mrs Jane Clucas

From:	Jeanette R Rosenberg
To:	lpaburystreet
Subject:	20/00848/FULEIA - Objection to proposed plans
Date:	22 November 2024 18:25:08

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THIS IS AN EXTERNAL EMAIL

To whom it may concern at the City of London Planning Authority

You did not notify me about the new consultation regarding revised plans for a 43-storey tower at 31 Bury Street, and I understand that I should have received a re-consultation letter from you.

I have only very recently learned about the submission of additional information and revised drawings by the promoters of the planned 43-storey building at 31 Bury Street.

I object to this construction project.

Why do I object?

The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

In addition, Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

From my perspective, the reasons for the planning refusal from 2022 remain the same. The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Moreover, the design changes will make hardly any difference to the

impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage ‘bar’ is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area.

Please register my strong opposition to the development proposals for 31 Bury Street.

Yours sincerely

Jeanette R Rosenberg OBE
41 Aldridge Avenue Edgware HA8 8TA.

From: Jacqueline Langer Hopson
To: lpaburystreet
Subject: Bevis Marks Synagogue 20/00848/FULEIA
Date: 23 November 2024 09:56:51

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THIS IS AN EXTERNAL EMAIL

Sirs

I believe the proposed development would have a significant effect on the Synagogue, which is a building of great cultural and historical importance.

In addition to detracting from this important building, the loss of light would cause severe detriment to the synagogue's use.

Please reconsider the proofed development.

Yours faithfully

Dr Jacqueline Langer Hopson

From: Philip Brodie
To: lpaburystreet
Subject: Bevis Marks Development Objection - reference 20/00848/FULEIA
Date: 23 November 2024 19:19:48

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I am writing to lodge a number of objections and concerns with respect to the current plans for development, i.e.

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.
- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.
- This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 still apply today
- The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any

event are counterbalanced by the fact that the heritage ‘bar’ even higher as the Synagogue has recently gained the added status of being within a Conservation Area.

- The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.
- Personally speaking, my great grandparents and grandparents lived nearby over 100 years ago, and it is very sad to think that such plans can literally severely affect the historic buildings which should be maintained for as long as possible for all the reasons outlined above.

I look forward to hearing from you accordingly.

Yours faithfully,

Philip Brodie
55 Willifield Way, London NW11 6YL

From: Richard Brett
To: lpaburystreet
Subject: 20/00848/FULEIA: Objection to Development
Date: 23 November 2024 19:42:44

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THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I object in the strongest possible terms to the proposals for a 43-storey tower at 31 Bury Street.

My objection is based on the following points:

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Furthermore:

- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

- This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

- The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area.

- The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Although I do not live in the local area, my family has a longstanding connection with Bevis Marks, as several of my ancestors were founding members in the early 1700s, and my family had continuous membership well into the 20th century.

I therefore trust that this proposed development will be refused, as it would have a significant adverse impact on some of the most important cultural and historical assets in the City of London and the surrounding area.

Yours faithfully,

Richard Brett

37 Westholm
Hampstead Garden Suburb
London
NW11 6LH

[redacted]

From: amnonp@icloud.com
To: lpaburystreet
Subject: reference 20/00848/FULEIA
Date: 23 November 2024 22:34:25

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THIS IS AN EXTERNAL EMAIL

Good evening,

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.
This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area.

The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports,

and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Yours sincerely ,

Amnon PALDI mr

From: Nathan
To: lpaburystreet
Subject: 31 bury st feedback
Date: 23 November 2024 23:59:35

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THIS IS AN EXTERNAL EMAIL

To Whom It May Concern

I have relatives who helped built the Bevis Marks Synagogue and were members there for at least the first hundred years of its existence. I have become aware of a proposed highrise in close proximity to it and would like to express my reservations regarding it. It is still a working synagogue and natural light is an important feature of the services there and I am concerned about the potential affect of such a tall building in close proximity to it and also the courtyard which holds various community and religious events. It seems the developer has previously made an application (20/00848/FULEIA) which was turned down due to its impact on the Synagogue's activities and also the Tower of London. While the developer has added various amenities for community use, the height and its potential effect on the Synagogue's services and community activities has not changed so I would suggest a reduced height or turning it down again.

Nathan Say
Victoria, BC, Canada

From: tony allan
To: lpaburystreet
Subject: Proposed development
Date: 24 November 2024 14:56:03

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THIS IS AN EXTERNAL EMAIL

Dear sirs,

I am all for redevelopment but when it means the destruction on an iconic London building it has gone far enough.
I am talking about Bevis Marks Synagogue.

I believe the objections listed are totally acceptable and require the City of London not accept this development for the following reasons:-

1) The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

2)The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

3)The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

4)The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

5)Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

6)This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today

Yours Sincerely

Tony Allan

From: Jennye Seres
To: lpaburystreet
Subject: Objection for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 24 November 2024 15:28:25

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To whom it may concern, I am extremely concerned that yet again this same application has been resubmitted with a few small alterations. I consider that to keep submitting in this way and expecting people to yet again object is harassment. Not withstanding the additional information provide by the applicant I strongly object to this new proposed building.

Objections are:_

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.
- Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.
- > This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.
- The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

  I hope that you will take account of all objections and consider the special significance of Bevis Marks.

Kind regards,
Jennye Seres

>

From: krismusi
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 24 November 2024 17:32:45

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THIS IS AN EXTERNAL EMAIL

Dear Sirs / TO WHOM IT MAY CONCERN

I have written my objections to previous planning applications of this site and am dismayed that, despite the Creechurch Conservation Area surrounding the Bevis Marks Synagogue, exceptions are being allowed for specific proposed developments. The makes a mockery of the agreement of the principles of the Conservation Area. The objections concerning the Synagogue remain unchanged as follow:-

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

As I have stated previously,

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Kris Musikant
London NW8 0EF
Email: [redacted]
Mobile: [redacted]

From: Basil Hillman
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 24 November 2024 18:01:27

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Sirs,

Further to my earlier objections, please note :

1) Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

2) This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

3) The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Yours sincerely,

Basil Hillman

[redacted]

Formerly of 4 King's Bench Walk, Temple, EC4Y 7DL

From: Jackie and Jonathan Patchick
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA) OBJECTION
Date: 24 November 2024 21:15:59

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THIS IS AN EXTERNAL EMAIL

Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)

We have previously objected to the proposals for a 43-storey tower at 31 Bury Street

We understand applicants have made changes to their design and again; We object to their proposal. These design changes will hardly change the impact on the Synagogue. We are sure you are aware the Synagogue is in a Conservation Area. Any 'public benefit' from such a proposal would provide little to no benefit upon the Synagogue and the community it supports. If there is any benefit to anyone, it would hardly begin to counter the damage the proposed tower will cause.

The Synagogue is a natural light sensitive space. Extensive reading of printed script is fundemental to our worship. The proposal will have an unacceptable impact on daylight levels inside; which is not acceptable.

The proposed structure will overshadow the Bevis Marks synagogue and it's courtyard which is used for various community and religious uses.Further more, in the Jewish religion it is an important part of tradition and ritual to track the path of the moon. This proposed building will overshadow and prevent this.

It will cause substancial harm both in heritage terms to the significance of the Synagogue and to the Creedchurch Conservation Area as a whole.

Over and above the points we outlined above, we would like to point out that this application is merely a similar application to 20/00848/FULEIA which was refused for two reasons - relating to the setting of Bevis Marks Synagogue and the setting of the Tower of London. Those reasons still apply and the proposal should be refused.

Jackie and Jonathan Patchick

From: Marcus da Costa
To: lpaburystreet
Subject: Objection to bury street development
Date: 25 November 2024 09:57:34

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To Whom it may concern,

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Kind regards

Marcus Gomes da Costa

Rachel Blake MP

Member of Parliament for the Cities of London and Westminster
House of Commons, London, SW1Y 5AA

City of London Planning & Transportation Committee
81 Negate Street
London
EC1A 7AJ

19th November 2024

Dear Members of the Committee,

I am writing to express my opposition to Planning Application 24/00021/FULEIA, which proposes the construction of a 43-storey building at 34 Bury Street. It is clear that this application will have a substantively negatively impact on worship at the Bevis Marks synagogue, the oldest synagogue in the United Kingdom, and the oldest synagogue in continuous use in Europe.

This new office building would block out the daylight, and the appearance of the moon from the synagogue and its courtyard for much of the day. This would make it impossible to mark the coming of the new moon, key to Kiddush Levana, which has been practiced at Bevis Marks for nearly four hundred years. This application would therefore breach Policy DM 10.8 of the City of London plan, which states that:

"To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is **inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;**

It would also contravene the 2021 London Plan, which stresses in GG1 G that new buildings:

"are designed to **reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods**."

These policies are made in mind with the City of London and Mayor of London's public-sector equality duties under the Equality Act 2010, particularly where this regards fostering **"good relations between persons who share a relevant protected characteristic and persons who do not share it"**.

It is clear that this development would contravene these duties, and therefore I believe that it be refused.

Yours sincerely,

[redacted]

Rachel Blake

Member of Parliament for the Cities of London and Westminster

From: Gerald Stern
To: lpaburystreet
Subject: Objection to Planning Application Reference 20/00848/FULEIA
Date: 25 November 2024 18:19:30

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

Bevis Marks Synagogue

I write in connection with the above planning application and would like to lodge my objection to this application on the basis:

• The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
• The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
• The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
• The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Also, I would emphasise that Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

It should also be noted that this application follows a previous, similar application by the same applicant (and the same ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today

The applicants say they have made changes to the design and are now providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage 'bar' is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area.

The 'public benefits' would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to

counter the damage the tower would cause.

Regards, Gerald Stern

--
Morton Lodge, 27A Shenley Hill, Radlett, Hertfordshire, WD7 7AU
Radlett:
Mobile:
Email:

From: [redacted]
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 25 November 2024 19:56:22

THIS IS AN EXTERNAL EMAIL

Dear Sirs / TO WHOM IT MAY CONCERN

I have written my objections to previous planning applications of this site and am dismayed that, despite the Creechurch Conservation Area surrounding the Bevis Marks Synagogue, exceptions are being allowed for specific proposed developments. The makes a mockery of the agreement of the principles of the Conservation Area. The objections concerning the Synagogue remain unchanged as follow:-

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

As I have stated previously,

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now providing space that can be used by community groups and

small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage ‘bar’ is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

BARRY MUSIKANT

LONDON NW8 0EF

e-mail: [redacted]

From: info@plashet.com
To: lpaburystreet
Subject: 20/00848/FULEIA - objection
Date: 26 November 2024 01:17:46

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THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

I was horrified to hear about the planning application by developers that would impact on the Bevis Marks Synagogue in London.

I know that I live miles away from this site, but whenever I am in London I love to spend some time at Bevis Marks Synagogue, the oldest Synagogue in England – it is a truly wonderful place that evokes a time that has passed sadly, but also provides members of the community with hope for its continued use.

I can see no good reason for the building of a 43-story tower at 31 Bury Street, London. I am sure that this tower **will not** be considered to be an object worth conserving in fifteen years, let alone over 100 years (like Bevis Marks Synagogue).

I am concerned about the substantial harm to the significance of this Synagogue that will come to the character and appearance of the Creechurch Conservation Area and other heritage assets. The need for natural light at the synagogue is imperative and I am sure that a 43-story tower would impact on internal daylight levels. I also understand that the proposal would result in unacceptable levels of overshadowing of the Synagogue's courtyard, which is used by the community and has other religious uses.

Surely it behoves the City of London to make sure that heritage areas of London are protected against unreasonable developments. In other cities they have turned heritage areas into areas for not only tourists but the local community to use. As I understand, Bevis Marks is a recognised Grade 1 Listed building, and as such should be granted freedom from this kind of encroachment. I also understand that this is not the first such application – as one was refused in 2022 (Ref: 20/00848/FULEIA). Surely the reasons that that refusal still stand today. I understand that the applicants say they have provided for community use and small businesses, but they still have NOT tipped the planning balances in their favour as far as Bevis Marks is concerned.

I really hope to hear in the near future that the City of London has refused this planning application outright.

Kind regards,

Mrs Miriam A. Pollak
Proprietor
PLASHET SERVICES PTY LTD
Melbourne, Australia
Email: [redacted]

From: Michael Yudkin
To: lpaburystreet
Subject: planning application for 31 Bury Street
Date: 26 November 2024 10:09:13

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THIS IS AN EXTERNAL EMAIL

ref. 24/00021/FULEIAG

Given the overwhelming strength of the objections that caused the previous applications to be refused, I find it difficult to believe that a revised application has now been made in respect of 31 Bury Street.

I refer particularly to the effect of the proposal on Bevis Marks Synagogue. Bevis Marks, which dates from 1701, is by far the oldest and most important synagogue in the United Kingdom, and is loved by Jews of all denominations. Visitors from abroad, whether Jewish or not, are keen to see the building, which is renowned for its historical and architectural interest as well as for its intrinsic beauty.

The proposed development would dwarf and overwhelm the Synagogue and its courtyard. Bevis Marks is a Grade 1 listed building, and it is now in a Conservation area, which enhances its status and makes the case for its protection even stronger than it was.

The development proposed here would be an act of vandalism, would amount to a slap in the face for the many people - architects, archaeologists and historians - who are interested professionally in Bevis Marks, and would leave the Jewish community feeling disrespected and ignored.

Michael Yudkin
12 Lonsdale Road,
Oxford,
OX2 7EW

From: Pat Black
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 26 November 2024 14:43:36

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THIS IS AN EXTERNAL EMAIL

I submitted my objections to the previous plans for the development on this site. The provision of community space in the new plans does nothing to lessen the damage which will be done to Bevis Marks Synagogue. My original objections stand, which are:

This proposed development is totally unacceptable given the impact it will have on Bevis Marks Synagogue. The development proposed in 2020 was rightly refused planning permission. This new application should be refused for the same reasons. It is too tall and will overshadow the synagogue, which is a Grade 1 listed building of great historical, cultural, and religious significance being the most important Jewish site in the UK. In particular, the new building will destroy the southern sky view which is an important part of the setting of the synagogue. The developers state that the new development will have many benefits for the community which, even if true, does not justify the harm which will be done to the synagogue. This development is in the Creechurch Conservation Area, this alone should be sufficient for the application to be refused. A development like this would not be permitted close to St Paul's Cathedral and should not be permitted here.

Pat Black

9 Compass Court

39 Shad Thames

SE1 2NJ

From: Anne Walker
To: lpaburystreet
Subject: Your ref: 24/00021/FULEIA and 24/00011/LBC
Date: 26 November 2024 18:30:41

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THIS IS AN EXTERNAL EMAIL

Anna Tastsoglou
Case Officer, Development Division
City of London

Via email: lpaburystreet@cityoflondon.gov.uk

Dear Ms. Tastsoglou:

Your ref: 24/00021/FULEIA and 24/00011/LBC

Thank you for your correspondence of October 29, 2024, and the opportunity to provide further observations with respect to the above-noted application.

Notwithstanding the additional information provided by the applicant, I continue to maintain my objection to the proposed planning application.

The applicant is seeking to demolish Bury House, partially demolish Holland House, and erect several multi-story buildings and extensions, one of which is 43 stories high. As you note, "[t]he application is for planning permission for development which does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated. The proposal is considered to affect a Building of Special Architectural or Historic Interest. The development is also considered to affect the setting of a listing building and the character and appearance of Creechurch Conservation Area."

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 continue to apply today.

The applicant claims it has made changes to the design, and is now providing space that can be used by community groups and small businesses which represents "public benefits" that should tip the planning balance in its favour. It must be noted that tipping the planning balance in its favour is now more difficult considering that the proposed changes impact structures within a Conservation Area. These alleged "public benefits" confer little to no benefit upon the Synagogue and the community it serves. Any claimed "public benefits" to others cannot compare with the damage the proposed development will cause to the Synagogue and the Conservation Area.

In summary, the proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting and substantial harm to the character and appearance of the Creechurch Conservation Area, as well as harm to a number of other heritage assets.

Bevis Marks Synagogue is a profoundly significant building within the City of London, and on a national and international level. It is widely recognised as being of outstanding communal, architectural, artistic, historical and archaeological significance. Recognised by Grade I Listed status, the building dates from 1701 and is the only synagogue to have provided continuous services for over 300 years. It is one of two such buildings in the entire UK and Europe. The proposed demolitions and the construction of a non-descript office tower, of which there are plenty in London, may forever alter this historic place.

Bevis Marks Synagogue must be preserved in its undisturbed condition, which includes maintaining access to and use of its structures and surrounding spaces. The proposal would result in an

unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses. The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels. As well, the view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

In addition, the overshadowing of the Synagogue by a 43 story tower may compromise the security of the Synagogue and its members and visitors. Such a compromise to security must not be permitted.

Thank you for your consideration of this letter.

Yours truly,

Dr. Anne Walker BSc MSc DVM JD
1081 Sarles Road
Stirling, Ontario, Canada
K0K 3E0
[redacted]

From: J.C.Keiner
To: lpaburystreet
Subject: Re-Consultation - Bury Street Planning Application
Date: 26 November 2024 18:38:29

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THIS IS AN EXTERNAL EMAIL

24/00021/FULEIA and 24/00011/LBC

I refer to my original response to the proposal to build a tower block in the very close vicinity of the historic Bevis Marks Synagogue, to which I sent an extended letter of objection at the time of the original planning consultation in May.

I have now studied the further amended proposals which you sent to me early in November.

These new proposals do not in my view go any way to remove or even substantially diminish the threat to the quality and significance of Bevis Marks Synagogue and to its setting in the Creechurch Conservation Area.

The installation of a 43 storey 2020s tower block at such close quarters would hugely diminish the grace and standing of the 1701 historic synagogue building, since the new building would totally dominate the Conservation Area, removing the impact of seeing this fine and unique contribution to our history given its proper dignity in its place as the prime building in its immediate vicinity.

I find it hard to believe that an act of such cultural vandalism would be visited on St Paul's Cathedral or Westminster Abbey as the most significant historic places of Christian Worship in our country.

The current application would also do nothing to mitigate the huge damage to the functioning of the Bevis Marks Synagogue that would be created if this or any other tower block were to be built in the Creechurch Conservation Area this close to the synagogue.

It will so much diminish the amount of natural light in the synagogue as to make it more difficult to read the hand calligraphed unpointed Hebrew of the Torah scrolls from which the sacred texts of the services are read, as well as diminishing the natural light needed to assist worshippers from reading their Hebrew service prayer books.

The overshadowing of the Courtyard of the Synagogue by the proposed building would make it all but impossible on most of the relevant monthly dates of the year for the congregation to witness the transition of the New Moon which is an essential part of the ancient and inspiring ceremonial Kiddush Levanah— the Sanctification of the New Moon.

This is no small matter. At a time when the Jewish community of Great Britain is under vilification, attack and very real threats, it is more than ever essential that its place as a proud part of British history and one of its oldest functioning non Christian places of worship remains as central and its amenities maintained undiminished as a place of worship and as testimony of the centrality of the Jewish community to the record of warm acceptance of its role as living testimony to British cultural history.

Judy Keiner

(Ms Celia Judith Keiner)

Ground Floor Flat
20 Holly Park
Finchley
London
N3 3JD

On Tue, 29 Oct 2024 at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:

> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team
>
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

From: Adam Musikant
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 26 November 2024 21:10:53

You don't often get email from [redacted] earn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Sirs / TO WHOM IT MAY CONCERN

I have written my objections to previous planning applications of this site and am dismayed that, despite the Creechurch Conservation Area surrounding the Bevis Marks Synagogue, exceptions are being allowed for specific proposed developments. The makes a mockery of the agreement of the principles of the Conservation Area. The objections concerning the Synagogue remain unchanged as follow:-

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Adam Musikant

From: Barbara Simon
To: lpaburystreet
Subject: Re: Re-Consultation - Bury Street Planning Application
Date: 27 November 2024 10:27:14
Attachments: Bury Street - Re-Consultation Letter.docx

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THIS IS AN EXTERNAL EMAIL

Dear Planning Administration Team

Yet again I am asked to give my approval for this scheme. How many times will they try and my answer is still a resounding NO. I do hope you will resist further applications as it wastes my time and it will always be NO WAY!!

Kind regards
Barbara Simon

Sent from my iPad

> On 29 Oct 2024, at 14:52, lpaburystreet <lpaburystreet@cityoflondon.gov.uk> wrote:
>
> Dear Sir or Madam,
>
> Please see the attached letter pertaining to the re-consultation for the Bury Street planning application.
>
> Kind regards,
>
> Planning Administration Team

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From: e-mail jeremy.schonfield
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 27 November 2024 11:19:00

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THIS IS AN EXTERNAL EMAIL

Dear team,
I write as a member of Bevis Marks Synagogue since the 1980s, who attends services weekly and cares very much for its future.
This renewed application for a building on this site could be regarded as vexatious. A similar plan was rejected in 2022 (ref 20/00848/FULEIA) due to its effect on the Tower of London and Bevis Marks Synagogue. The impact on the synagogue remains negative, despite the changes made (I am not qualified speak for the Tower).
The conservation area that has been established around the synagogue is obviously compromised by this plan, and is sufficient grounds for rejecting the application. The application should not have been allowed.
The practical objections remain unchanged. The vibrations that would inevitably result from construction work so nearby would endanger this Grade 1 listed building, whose importance to the worldwide Jewish community is particularly high, as the oldest synagogue in continuous use in Europe. The noise of construction work would disrupt services and also the daily life of the rabbi, who lives next door on Heneage Lane and has a small child.
The quality of light inside the building is a sensitive issue. On sunny days there is a golden quality to the light that lifts the atmosphere and shows the patina of the furniture and the polished brass lamps to advantage. Light is essential for following the complex liturgy and Bible readings. The electric lighting, which was installed in the 1920s, is insufficient but cannot be changed, since the fittings are attached to the columns of the gallery. On gloomy days the interior is shadowy and lifeless. The proposed tower would plunge it into perpetual semi-darkness.
Blocking off the sky from the courtyard would make it impossible to perform the rituals around the new moon, as they have been for three centuries.
This major tourist asset should not be damaged, especially as a visitors' centre is currently being completed, and is due to open in the next year.
Yours truly,
Jeremy Schonfield

Jeremy Schonfield

Professor of Liturgy, Leo Baeck College, London

Supernumerary Fellow, Oxford Centre for Hebrew and Jewish Studies

From: schonfield tamar
To: lpaburystreet
Subject: Proposals for a 43-storey tower at 31 Bury Street (ref. 24/00021/FULEIA)
Date: 27 November 2024 11:22:04

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THIS IS AN EXTERNAL EMAIL

I am a member of Bevis Marks synagogue and wish to object to this proposal for the following reasons:

1. Bevis Marks is a grade 1 Historical building in a Conservation area. Building more modern blocks around it will undermine the atmosphere and make mockery of the idea of conservation.
2. Overshadowing the building and reducing daylight will compromise the religious experience of Synagogue users, who will have to augment God's created light with man-made electricity when reading the scripture.
3. Bevis Marks is the oldest synagogue in unbroken service not only in Britain, but possibly world wide. Therefore, the way it is respected and protected has wide reaching echoes and has to be taken seriously.

Yours truly,
Tamar Schonfield

From:
To:
Cc:
Subject: Proposal for 43 storey tower at 31 Bury Street (ref 24/00021/FULEIA)
Date: 27 November 2024 15:46:45

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I wish to register my strongest objections to your proposal for the development of the above project. Please take these comments into account.

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now

providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage ‘bar’ is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Please register my strongest objection to this proposal and inform me of your decision by return.

Many thanks,

Ketty Ozer
6 Huson Close
London
NW3 3JW

PLANNING APPLICATION (24/00021/FULEIA) - OBJECTION
BURY HOUSE, 31 BURY STREET

From:
PNatali
14LeasideAvenue
London
N103BU

Date: 27 November 2024

Application Reference:	24/00021/FULEIA
Address:	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal:	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Case Officer:	Anna Tastsoglou

I object to this planning application (24/00021/FULEIA) at Bury House, 31 Bury Street.

I have previously objected to a similar application (20/00848/FULEIA) on the same site.

The previous application (20/00848/FULEIA) was refused on 22 June 2022 by the City Corporation, in part, because "*The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality)*.".

I objected to the current application on 2 April 2024. That application has now been amended and additional information submitted (as per your letter of 8 October 2024).

The current application (24/00021/FULEIA) is of no greater merit than the previous, refused, application; the current application would also have an overbearing and overshadowing impact on the Synagogue and its courtyard and it would be at the expense of the Jewish community. I am therefore very concerned about the current application.

Bevis Marks is the oldest continually functioning Synagogue in the UK, with families able to trace their roots back to the early days of the community in the 17th century. It is an important part of this country's multi-faith heritage and is an active and vibrant Synagogue and community. It is a pity that the wannabe developer is seeking to obtain planning consent for a scheme that will be detrimental to the Synagogue, its community and its wider place in Britain's heritage.

My objections to the current proposals are many and include, in part, the following:

- The proposed 40+ storey tower would completely overwhelm the Grade 1 Listed Synagogue building, which is of enormous historic and cultural significance.
- The proposed tower would overshadow the Synagogue and its courtyard for much of the day. It would further reduce the already minimal daylight that penetrates into the Synagogue, making it even more difficult to conduct worship. It would also reduce the ability for the Synagogue's courtyard to be used for rituals and celebrations.
- Although the wannabe developer's Design and Access Statement sets out (at 5.4a3) that the current proposals include a height reduction from the previous proposals such that, it is claimed "*The height reduction and stepped form of the upper sections are purposely designed to minimise any adverse impact to views from the [Synagogue's] courtyard*", this is disingenuous as the wannabe developer is incorrect *viz* in order to minimise any adverse impact to views from the Synagogue's courtyard there should be NO new development visible from the Synagogue's courtyard. (See also comments concerning light above.)
- Irrespective of any qualities of design or sustainability, a building of the size and scale proposed is simply inappropriate to be built so close to a Grade 1 Listed Synagogue building; a similar approach would not be permitted adjacent to St Paul's Cathedral and there is no good reason for such an approach to be acceptable adjacent to Bevis Marks Synagogue.
- The City of London's heritage, and the Jewish community's centuries old ability to worship at the Synagogue, should not suffer at the expense of alleged benefits that the wannabe developer contends might become available elsewhere in the area. Britain's Jewish community and its heritage do matter and must be preserved.
- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict between the proposed development and the statutory development plan. The City Corporation would be disingenuous were it, on the one hand, to create the Creechurch Conservation Area and, on the other hand, to remove the very restrictions pertaining to the Creechurch Conservation Area that benefit the Synagogue and its setting.

Further, I note the following:

- The objection to the application that appeared in The Times on 26 November 2024 (Appendix A, attached), the terms of which I wholeheartedly agree.
- The Ministry of Housing, Communities and Local Government has now restricted the granting of permission by the Corporation, to allow the government to consider the case: https://www.bbc.co.uk/news/articles/cgr08wq4qn0o.
- It is high time that the Corporation put an end to the repetitive actions of wannabe developers seeking to harm Bevis Marks and the Jewish community. It is unconscionable that year on year wannabe developers' actions leave the Jewish community and its supporters feeling under constant threat of development taking place around Bevis Marks, which results in so much energy having to be devoted to defeating the wannabe developers at every turn, all at the expense of the community wishing to be able to continue with its continuing peaceful worship at Bevis Marks.

I request that the City Corporation rejects the proposed development.

Thank you for your attention.

APPENDIX A

Letter in The Times 26 November 2024

Synagogue in peril

Sir,

For more than 300 years the Grade I listed Bevis Marks Synagogue has been at the heart of British Judaism. It is one of the most natural light-sensitive places in London, where extensive reading of printed texts is fundamental to worship. That may become impossible, especially in the winter months, if a 43-storey tower is built at 31 Bury Street, overshadowing the synagogue and its courtyard. The proposal will be considered by the City of London planning committee on December 13. A similar proposal was rejected in 2022 because of the damaging impact on the synagogue and the Tower of London. The former is now included in a conservation area, which ought to give further protection, but the City of London is trying to undermine this. More than 1,340 objections have been received and we urge the committee to reject the plan.

Sir Michael Bear, lord mayor of London 2010-11; **Lord Levene of Portsoken**, lord mayor of London 1998-99; **Rachel Blake**, MP for the Cities of London & Westminster; **the Right Rev Sarah Bullock**, Bishop of Shrewsbury; **Sir Stuart Lipton**; **Professor Sir Simon Schama**; **Baroness Deech DBE KC**; **Lord Dyson**; **Rt. Hon Lord Howard of Lympne CH KC**; **Baroness Neuberger DBE**; **The Rt. Hon Lord David Triesman**; **Lord Wolfson of Tredegar KC**, shadow attorney-general; **Phil Rosenberg**, president of the board of deputies of British Jews; **Keith Black**, chair of the Jewish leadership council; **Professor Lucy Noakes,** president of the Royal Historical Society; **Professor Miri Rubin**, president of the Jewish Historical Society of England; **Rabbi Shalom Morris**, Bevis Marks Synagogue; **Rabbi Joseph Dweck**, senior Rabbi S&P Sephardi Community; **The Very Rev Prof Sarah Foot**, Dean of Christ Church, Oxford; The Rev **Laura Jorgensen**, St. Botolphs without Aldgate and area dean of the City of London; **The Rev Josh Harris**, Priest-in-Charge at St Katharine Cree; **Sadiya Ahmed**, founder of Everyday Muslim Heritage and Archive Initiative; **Tom Holland**, FRSL; **Simon Sebag Montefiore**; **Professor Sir Christopher Clark**, regius professor of History at Cambridge University; **Professor David Feldman**, Director of Birkbeck Institute for the study of antisemitism; **Dr Jaclyn Granick**, senior lecturer in modern Jewish history, Cardiff University; **Abigail Green**, professor of Modern European History at Oxford University; **Professor Tony Kushner**, The Parkes Institute, University of Southampton; **James Parkes**, professor of History; **Professor Laura Leibman**, Princeton University, Leonard J. Milberg ’53 professor in American Jewish studies and president of the Association of Jewish studies; **Professor Peter Mandler**, professor in Modern Cultural History at Cambridge University; **Professor Lyndal Roper**, Regius professor of History, Oxford University; **Dr Mia Spiro**, head of Theology and Religious Studies at Glasgow University and president of the British and Irish association for Jewish Studies; **Dr Tom Stammers**, reader in Art and Cultural History at the Courtauld Institute; **Professor Zoe Waxman**, professor of Holocaust Studies at Oxford University; **Professor William Whyte**, professor of Social and Architectural History at Oxford University.

From:	Edwin Segall
To:	lpaburystreet
Subject:	Planning Applications 31/34 Bury St EC3A 5AR Ref 24/00021/FULE1A
Date:	28 November 2024 23:41:15

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THIS IS AN EXTERNAL EMAIL

I am a member of the S&P Sephardi Congregation and a regular worshipper at Bevis Marks Synagogue.

I was horrified to learn of the application which has been submitted to erect a 43 storey office tower on the site of Bury House, which would have a devastating effect on the Synagogue and those who worship there.

The Synagogue is already surrounded by buildings which cut out a good deal of natural light, particularly on dull days. If the proposed building were erected however, not only would the Synagogue be deprived of further light but at night the moon would no longer be visible from the exterior of the building, which would prevent the practicing of an important religious ritual.

I am also most concerned about the damage which the excavation works involved with the erection of the proposed block would cause to the foundations and upper structure of the Synagogue building, especially bearing in mind that it was built over 300 years ago, when building regulations were non existent and foundations were much shallower than they are today. If, despite the overwhelming opposition to this planning application, permission were to granted, then the architects, civil engineers and other professionals involved in the erection of the new building, not to mention the contractors themselves, would need to be fully covered by indemnity insurance against the untold damage that could be caused to the Synagogue and other nearby properties.

I would be most surprised if the Corporation of London were to grant its consent to the erection of such a completely out of scale office building, which would leave such a shameful and permanent legacy on one of its most unique and historic buildings. What a contrast this would make to the recently constructed piazza at the end of the street, which has secured an uninterrupted view of St Botolph's Church.

Unfortunately, the City of London already has too many ziggurats, each one more hideous in its appearance than the next, and to permit the erection of yet another, particularly in a location so close to a conservation area, would only tarnish the landscape of the City even further.

Edwin Segall
34 Aston Avenue
Harrow
Middx HA3 0DB
[redacted]

Sent from my iPad

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Begum, Shupi

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 15 March 2024 12:31
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC [SG30645]

THIS IS AN EXTERNAL EMAIL

Our Ref: SG30645

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Public

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Thursday, March 14, 2024 2:25 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: [EXTERNAL] Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

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Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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LPA Ref: 24/00021/FULEIA and 24/00011/LBC

London City Airport Ref: 2024/LCY/067

Date: 19/03/24

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

LPA Reference	24/00021/FULEIA and 24/00011/LBC
Proposal	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam;

	partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.
Location	1-4, 31-34 Bury Street, London, EC3A 5AR
Borough	City of London
Case Officer	Anna Tastsoglou

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height

- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

Begum, Shupi

From: Active Travel England Planning <planning-consultations@activetravelengland.gov.uk>
Sent: 20 March 2024 08:52
To: lpaburystreet
Subject: LPA Reference: 24/00011/LBC Standing Advice Response

THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00011/LBC

ATE Reference: ATE/24/00380/FULL

Site Address: HOLLAND HOUSE, 1-4 BURY STREET, LONDON, EC3A 5AW

Proposal: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw0000007FiHIAU;700adc70ab4a894d32d59c518cfe6871:ref]

Begum, Shupi

From: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Sent: 20 March 2024 10:13
To: lpaburystreet
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk) https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince|Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Reply

Forward

P

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 14 March 2024 14:25
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

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Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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Transport for London

lpaburystreet@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

21 March 2024
Crossrail Ref: CRL-IP-3124

Dear Anna Tastsoglou,

24/00021/FULEIA : 1-4, 31-34 Bury Street, London, EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works..

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter 14 March 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

creating a better place

Environment Agency

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/01
Your ref: 24/00021/FULEIA

Date: 26 March 2024

Dear Anna,

Bury House, 1 - 4, 31 - 34, Bury Street, London, EC3A 5AR

Demolition of bury house and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of holland house and renown house; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at holland house (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at renown house (36.49m AOD); interconnection of the three buildings; use of the buildings for office (class E(G)), flexible retail/café (class E(A)/E(B)), and flexible community/education/ cultural/amenity (class F2(B)/ F1(A)- (E)/ E(F)/sui generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Thank you for consulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

Water Resources
Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM ‘excellent’ standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Cont/d..

INVESTOR IN PEOPLE

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLSustainablePlaces@environment-agency.gov.uk.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

End

Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00021/FULEIA
Our Ref: 220218

Contact:
Helen Hawkins
[redacted]

2nd April 2024

Dear Anna,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021

Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works

Recommend Archaeological Conditions

Thank you for your consultation received on 14th March 2024.

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

Assessment of Significance and Impact

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

The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.

All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk-based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation.

The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here.

It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is

recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented.

A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider archaeological conditions could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching conditions as follows:

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

nomination of a competent person(s) or organisation to undertake the agreed works.
If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

Condition 2 Public Engagement .

No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

Condition 3 Foundation Design ...

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

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

Evaluation

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

Public engagement

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

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

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

Yours sincerely

Helen Hawkins

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

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

[redacted]



From: Bentley, Paul [redacted]
Sent: Tuesday, April 2, 2024 8:45 AM
To: Tastsoglou, Anna [redacted]
Subject: RE: Bury Street 24/00021/FULMEIA - air quality

Good morning Anna,

I hope you had a lovely Easter weekend.

I've been through the AQ Positive statement, and it is adequate for the proposed development. No further comments from me aside from those already sent across.

Kind regards,

Paul

Paul Bentley
Air Quality Officer
City of London | Environment Department | Guildhall | London | EC2V 7HH
[redacted]
www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

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APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00021/FULEIA

Development Management Case Officer: Anna Tastsoglou

Site Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Application Received: 8th January 2024

Request for Comment Received: 14th March 2024

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Sustainability Statement (Hoare Lea, October 23)
- Design and Access Statement (Stiff+Trevillion, January 2024)
- Flood Risk Assessment and Drainage Strategy (Thorton Tomasetti, January 2024)
- Outdoor Thermal Comfort Assessment (GIA Chartered Surveyors, October 2023)
- Preliminary Ecological Appraisal and Biodiversity Net Gain Report (Hilson Moran, September 2023)
- Health Impact Assessment (Quod, January 2024)

Overheating and the urban heat island effect

There are no site-specific references to overheating or the urban heat island in the Sustainability Statement, although the report does refer to Policy CR1in the policy review.

An outdoor thermal comfort assessment was conducted by GIA using high resolution Computational Fluid Dynamics (CFD). The assessment found:

- All ground level conditions were suitable for intended use, or no worse than the baseline conditions
- The proposed development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe
- Conditions for all existing off-site terraces are suitable for the intended use

Date & Initials

- Conditions for all proposed terraces are suitable for the intended use.

Flooding

The proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event.

Water stress

The FRA & DS states that "*roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants.*"

The FRA & DS states that roof drainage will be used for irrigation for the green roofing and green walls.

Biodiversity and pests and diseases

A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

The Sustainability Statement states "*The project will prioritise native, locally sourced plants (from within the UK) as part of the landscape strategy for the public realm, a decision driven by both responsible procurement and biosecurity considerations.*"

There is no reference to pests and diseases within the Sustainability Statement or PEA.

A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through:

- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment;
- Provision of flexible community/education/cultural space meeting an identified need in the area;
- 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;
- A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above);

APPLICATION COMMENT FORM	
• Provision of new open space at James' Court and external building terraces providing much needed amenity provision; • Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment; • Inclusivity and accessibility as placemaking principles; • Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity; • The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards • BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures Food, trade and infrastructure The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure. Recommendation: The proposed development is not compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2. The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit: *Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also*	EB 03/04/24

APPLICATION COMMENT FORM	
demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.	

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/01716/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email:

Anna Tastsoglou
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

3 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/01716/OBS **Application Date:**

Date Received: 14.03.2024 **Date Amended:** 14.03.2024

Plan Nos: Letter from City of London dated 14 March 2024.

Address: Bury House, 31 Bury Street, City Of London, EC3A 5AR

Proposal: Application for planning permission ref. 24/00021/FULEIA:

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Application for listed building consent ref. 24/00011/LBC:

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.

4635 Crystal Mark
Clarity approved by Plain English Campaign

Note:

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- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
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Crystal Mark
Clarity approved by Plain English Campaign

[redacted]



From: Roebuck, Alex <[redacted]>
Sent: Wednesday, April 3, 2024 3:52 PM
To: Tastsoglou, Anna <[redacted]
Subject: RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Hi Anna, the proposals do not appear to affect any existing trees so no comments to make at this time.

Thanks
Alex

Alex Roebuck
Arboricultural Projects Officer |Gardens and Cleansing
City of London | Environment Department | Guildhall |
London | EC2P 2EJ
[redacted]
Twitter: @CoLCityGdns
www.cityoflondon.gov.uk

From: Tibbetts, Jake <[redacted]>
Sent: Thursday, March 21, 2024 9:18 AM
To: Roebuck, Alex <[redacted]>
Subject: FW: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Jake Tibbetts (he/him)
City Gardens Manager |Gardens and Cleansing
City of London | Environment Department | Guildhall | London | EC2P 2EJ
[redacted]
Twitter: @CoLCityGdns
www.cityoflondon.gov.uk
Bob Roberts
Interim Executive Director Environment

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Thursday, March 14, 2024 2:25 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <[redacted]>
Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 76749
Your Ref: 24/00021/FULEIA

4 April 2024

Dear Sir/Madam

Re: 1-4, 33-34 , BURY STREET, LONDON, EC3A 5AR

Waste Comments
The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783468059%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=KPU05FUvFf55w6xXOMw5ZU44IEgfvIPx5Vlf0%2BwUCaKc%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloper&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783458921%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=rLTIWxmFvrxPeccwLjw%2BPGKBBqVlWn697ULWSQqjYXo%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, twning and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloper&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783461786%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=tT7XL0YF%2Ftk7SMLZOHxvcYqVy3enj2zFCGDgbmuJfbk%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783467059%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=3cRpas4Le4fkkyWAZ3BFbqNneFVFvSfnf1ddc%2FfStTA9E%3D&reserved=0

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783472112%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=2lnBYJ32W6NSlgOJLWLTXGBvW6T5PPmdBHhZKA9feA%3D&reserved=0

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783476395%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=XLgbn1VuQHHqMAiBvBkfokUOnL YnAVIG3%2FjlGpv3E%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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Visit us online https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783468606%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=lqc%2FwjLtVo%2BMnSlgGTcJA0tw15D%2BrtidEFbuU4C%2Fc%3D&reserved=0 , follow us on twitter https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783484639%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=bBe51hSZvf0Vu76bnP6le0SQPuyMPqIGX13vgerqJF%3D&reserved=0 or find us on https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswaterdata&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C2e02d3fdd087c44bc904708dc54bd5898%7C3fe658bcdb3ce0405685193222fa98ae8%7C0%7C0%7C638478380783484887 4%7CUnknown%7CTWFpbGZsb3dBeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=y1kflZ3bhto7HeIUIaAfe9c3CWTkdFhsCuLFYjP%2BU8%3D&reserved=0. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Corporation of London Department of Planning & Transportation
PO Box 270 Guildhall London EC2P 2EJ
4 April 2024

Our DTS Ref: 76749 Your Ref: 24/00021/FULEIA

Dear Sir/Madam

Re: 1-4, 33-34 , BURY STREET, LONDON, EC3A 5AR

Waste Comments
The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.” Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We’ll need to check that your

development doesn’t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we’ll need to check that your development doesn’t reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

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Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW,
Denham Way, Rickmansworth, WD3 9SQ



From:	Location Enquiries
To:	lpaburystreet
Subject:	RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC
Date:	09 April 2024 13:29:53
Attachments:	image001.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

ref. 24/00021/FULEIA
Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN





From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: 14 March 2024 14:25
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>

Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Reply with your comments to lpaburystreet@cityoflondon.gov.uk

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0013

Date of issue of this decision: 12/04/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0013 **Date of Issue of Decision:** 12/04/2024
Your Ref No.:

Applicant Ms Anna Tastsoglou
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Request for observations from City of London Corporation for 'demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works'.

And an application for listed building consent for the following works at the above site (ref. 24/00011/LBC):
'Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works'.

At 1-4, 31-34 Bury Street, London, EC3A 5AR And Holland House, 1-4, 32 Bury Street, London, EC3A

In accordance with your letter received on 15 March 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 24/OB/0013

Date of issue of this decision: 12/04/2024

www.southwark.gov.uk

CONSULTATION RESPONSE: OBJECT

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

By email to: plans@cityoflondon.gov.uk & anna.tastsoglou@cityoflondon.gov.uk

Our reference: 24025

1st May 2024

Dear Anna Tastsoglou,

24/00021/FULEIA | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

SAVE Britain's Heritage strongly objects to the above planning application for Bury House 1-4, 31-34 Bury Street on the grounds that this proposal would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area which is designated to protect multiple highly listed heritage assets and their character. SAVE also strongly objects to the total demolition of Bury House on climate grounds. We further note that a previous scheme for a 48-storey tower at No. 31 Bury Street was already refused permission in 2022 (ref no. 20/00848/FULEIA) on the grounds that the development would overbear and overshadow the Bevis Marks synagogue. For these reasons, this application fails to comply with national and local policy for preserving the historic and natural environment of the City of London, and so we call on the Local Planning Authority to refuse planning permission.

Proposal

This application proposes the total demolition of Bury House and construction of a 43-storey building; the partial demolition of Holland House and Renown House; and the erection of roof top extensions on these buildings.

Significance

The application site lies on Bury Street and includes the Grade II* listed Holland House (No. 1-4 and 32 Bury Street), Bury House (No. 31 Bury Street) and Renown House (No. 33-34 Bury Street). It is fully located within the Creechurch Conservation Area, which was newly designated in January 2024.

The site is adjacent to the Grade I listed Bevis Marks Synagogue which is one of England's most important religious buildings and is of exceptional historic and architectural value of the highest significance. Bevis Marks was constructed between 1699-1701 to designs by Jospeh Avis. The synagogue's internal fittings, which include benches, an ornately carved echal and seven brass chandeliers, are recorded by Historic England as being 'remarkably complete and little altered'. Historically, the Bevis Marks Synagogue was home to the Sephardic Jewish Community which first settled in Aldgate in the 18th century. It is the only synagogue in Europe that has been in continuous worship for over 300 years, and so is a building of international importance and outstanding historic value.

The newly created Creechurch Conservation Area (CCA) includes listed buildings of outstanding and exceptional heritage significance. In addition to Bevis Marks, two other buildings within the CA are of Grade I listed status. These are St Katherine Cree Church (1628-31) and St Botolph's Church (1741-44). Only 2.5% of listed buildings are Grade I.

Holland House, is a Grade II* listed building within the CCA, constructed between 1914-16 to designs by the Dutch architect H.P.Berlage with interiors by Henri van de Velde. The steel-framed building is clad in grey-green faience with a black marble base and doorway. The building's facade has a striking rhythm, brought to life by an alternating pattern of prominent vertical ribs and narrow windows, punctuated by decorative sunk bosses. The building was heralded by Pevsner as being of 'remarkable design', which emphasises this building's architectural importance.

No. 31 Bury Street, Bury House, is a non-designated extension to Holland House by Gotch & Partners in 1967 which is harmonious in scale with Holland House. Its height of five storeys, plus two set-back floors, does not overwhelm the Grade II* listed building nor overshadow the Creechurch Conservation Area.

A number of non-designated heritage assets make further positive and sensitive contributions to the architectural character of the conservation area. Renown House (within the application site) is a handsome Edwardian commercial building, built in 1912 to designs by Delissa Jospeh. Located on a corner plot as Bury Street winds into Creechurch Lane, the building defines the corner with its confident neo-French Classical style. Its present scale, massing and materiality is harmonious with the neighbouring Holland House, Bevis Marks Synagogue and wider CCA.

Assessment

1. Substantial harm to Bevis Marks Synagogue

SAVE considers that the proposed 43-storey tower at No. 31 Bury Street will cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The proposal will fundamentally alter the streetscape around this highly designated asset which is of exceptional historic value.

The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Further to this, Para 206 NPPF (2023) provides that any harm to the significance of a heritage asset, including its setting, requires clear and convincing justification. SAVE contests the applicant's claim in the Heritage, Townscape and Visual Impact Assessment [para 8.134] that "only the immediate setting of the Bevis Marks Synagogue contributes to its significance", to be insufficient to comply with Para 206. Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic Environment (2015) sets out that, "setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage". We consider that the proposed 43-storey tower, which would be visible from within the courtyard of Bevis Marks synagogue, has a direct and substantially harmful impact upon the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior. We wish to highlight the reason for refusal of application 20/00848/FULEIA which found that a tall building at No. 31 Bury Street would "affect the setting of the Grade I listed

Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue".

This proposed development contravenes local as well as national policy. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. More specifically, Policy HE1 [Managing Change to the Historic Environment] of the emerging City Plan 2040 recognises that the Bevis Marks Synagogue requires, "special consideration and protection, given their outstanding architectural and historic significance and…the critical contribution of elements of setting to that significance." We call upon the LPA to refuse a planning application which fails to comply with national and local policy and contradicts the emerging City Plan 2040.

2. Substantial harm to the Creechurch Conservation Area (CCA)

The application site, whilst within the City Cluster, is fully within the Creechurch Conservation Area which was newly designated in January 2024. Policy CS14(2) of the City of London Local Plan (2015) states that planning permission for tall buildings will be refused within inappropriate areas, such as conservation areas. Policy S12 [Tall buildings] of the emerging City Plan (2040) elaborates that "tall buildings must have regard to… the significance of heritage assets and their immediate and wider settings".

We strongly object to this proposal on the grounds that it would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. At 43-storeys, the proposed tower would overshadow a number of highly designated heritage assets, which include three buildings of the highest possible listed status, which the conservation area is designated to protect. We consider the tower, which would be located directly behind Holland House and Renown House, would diminish the primacy and appreciation of these buildings. The drastically increased scale from the present 7-storey Bury House would compound this harm.

In the absence of a formal Appraisal and Management Plan yet to be adopted, we refer to The Proposed Bevis Marks/ Creechurch Conservation Area (2022) draft documentation which recognises 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 building" (p. 3, para 1.02). The erection of a tower within the CCA would erode its low-scale, harmonious townscape. This is unsupported by local policy. Policy CS12(2) of the City of London Local Plan (2015) requires that to conserve the significance of the City's heritage assets, the distinctive character and appearance of the City's conservation areas will be preserved and enhanced, while allowing sympathetic development within them. This proposed application cannot be considered sympathetic development.

3. Substantial Harm to Holland House and Renown House

The works proposed to Renown House and the Grade II* listed Holland house (in the associated application 24/ 00011/ LBC) are strongly concerning. We recognise that the rooftop alterations to Holland House are later additions, not contemporaneous with the original 1916 building. However, they are sufficiently set back from the building's facade to be considered largely unobtrusive when viewed from the streetscape. The proposed 4-storey roof top extension is an increase in scale and massing which would overwhelm Holland House and detract from an architectural appreciation of the building. The extension of Renown House by a storey, and the realignment of the floor plates to connect with Holland House constitutes further, drastic alteration which, when as read a whole, amounts to substantial harm.

Para 207 NPPF (2023) provides that, "where a proposed development will lead to substantial harm to…a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm". We do not consider that the

purported public benefits from this development can outweigh the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31 Bury Street.

4. Views of the Tower of London

The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Whilst we acknowledge a reduction in height from the previous application 20/00848/FULEIA, we do not consider this sufficient to mitigate the adverse impact on the setting of the Tower of London.

Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements, also stating that: "*they should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views*". The scheme cannot be considered in compliance with this policy.

5. Unsustainable development

This application cannot be considered sustainable development. The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 157 NPPF (2023) and Policy CS15 of the City of London Local Plan (2015) which provides that the demolition should be avoided through the reuse of existing buildings and their structures.

This development would further contradict emerging policy which recognises the wider benefit in heritage terms of the retrofit first approach. The City of London Corporation is currently consulting on Planning for Sustainability Supplementary Planning Document (SPD). Chapter 3 [Retrofit and Reuse] states that, *"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"*. We consider this application fails to meet national and local policy on sustainability grounds and runs counter to emerging guidance on sustainable development.

Conclusion
For the reasons outlined above, SAVE objects to this planning application on heritage and climate grounds, and we call on the Local Planning Authority to refuse planning permission.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,

[redacted]

Lydia Franklin
Assistant Conservation Officer, SAVE Britain's Heritage

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www.savebritainsheritage.org
Registered Charity 269128

THE GEORGIAN GROUP

08/05/24

Application: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

LPA Reference: 24/00021/FULEIA & 24/00011/LBC

Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Dear Ms Tastsoglou,

Thank you for consulting the Georgian Group on the above applications for Planning Permission and Listed Building Consent. Based on the information available to date, the Group objects to both applications for the reasons set out within this letter.

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. Since then, the Creechurch Conservation Area has been designated offering greater protection for this internationally significant building.

Summary

The Georgian Group objects to the applications for Planning Permission and Listed Building Consent. The Group's statutory remit is 1700-1840 and it is only buildings within that period referred to in this letter. For buildings outside this period, the Group defers to the expertise of our sister national amenity societies.

The location, height and massing of the proposed development would cause considerable harm to the significance of Bevis Marks, St Botolph's Church and the Creechurch Conservation Area. The proposed development is defined as a tall building and therefore in line with policy CS14 of the existing local plan should not be permitted within a conservation area. Consequently, the development would be contrary to policy D9 of the

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

London Plan. The height and massing of the building would cause considerable harm to the three heritage assets referenced above and is therefore contrary to legislation as well as national and local policy relating to heritage assets.

The Georgian Group is aware of the consultation on the proposed City Plan 2040 and will be making representations to address specific concerns with the plan.

Significance of Surrounding Heritage Assets and Area

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 lampstands 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 was 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.

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 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.

Creechurch Conservation Area

The Creechurch Conservation Area was officially designated in January 2024. The Georgian Group were vocal in supporting its designation to acknowledge the unique historic and architectural interest associated with this section of the City of London.

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 create a distinct character of important religious institutions. As stated above, the landmark quality of St Botolph's without Aldgate is a contributing factor to the interest of the conservation area and the prominence of the

spire within the local surroundings contributes to the strong ecclesiastical character of the conservation area.

Proposal

The applicant intends to demolish Bury House and erect a new building comprising four basement levels and ground plus 43 storeys. A full description of the proposals, as well as the listed building consent application, can be found at the head of this letter.

Proposals and Their Impact

Bevis Marks Synagogue

The courtyard wrapped around Bevis Marks should be seen as an extension of the building due to the vital liturgical function it plays in the workings of the synagogue. The courtyard forms the immediate setting of the building and allows visitors to appreciate the unique setting and appearance of the building. The setting of Bevis Marks contributes greatly to the significance of the building, allowing light into the synagogue which is integral to the practices of Judaism.

The proposed development as shown within the submitted HTVIA would be a dominating visual intrusion on the courtyard and setting of the synagogue. Views 45a and 45b show the impact the proposed tall building would have on the setting of Bevis Marks and the synagogue. The height, massing and positioning of the proposed tower would have an overbearing impact on Bevis Marks harming the setting and the ability to experience the building.

Owing to the impact the proposed tall building would have on the setting of Bevis Marks the level of harm would be towards the higher end of Less than substantial due to the importance of the setting and the potential for reduced light.

St Botolph Without Aldgate

The spire of St Botolph's church is prominent within the local environs and views within the Creechurch Conservation Area. It is identified within the City of London Protected Views SPD as being a church with a 'skyline presence'. The prominence of St Botolph's spire can be appreciated from along Aldgate High Street looking West and from the Minories looking North. Kinetic views of St Botolph's and its spire are permitted when moving around the Creechurch Conservation Area and the wider surroundings which all contribute to the significance of the building.

The applicant has provided views towards the church within the submitted HTVIA on pages 189-194 and identified as views 38 and 39. View 38 is situated along Aldgate High Street and shows the proposed development rising above One Creechurch Place, a building which harms the setting of the church and detracts from the interest of the Creechurch Conservation Area. The cumulative view shows the proposed tall building grouped in with 100 Leadenhall Street and 1 Undershaft. The height, massing and proximity would challenge the landmark quality of St Botolph's Church which is more evident within view 39 situated further east along Aldgate High Street. The impact of the towers would be further exacerbated in kinetic views along Aldgate High Street where the proposed development would be visible in the skyline behind the church.

The positioning of the tower in relation to the spire of St Botolph's would challenge its presence on the city skyline and be a distraction in views down Aldgate High Street. Both

the presence of the spire and views towards the church contribute to its significance and therefore the proposed development would cause an element of harm to St Botolph's Church. This harm would be at the low-middle level of less than substantial harm.

Creechurch Conservation Area

Views within the Creechurch Conservation Area contribute considerably towards its significance and allow for the special interest of the area to be appreciated. As referenced above concerning Bevis Marks and St Botolph's, the impact on those individual assets is similarly applicable to the wider character and appearance of the Creechurch Conservation Area which the proposed development would cause harm to.

The special interest associated with the Creechurch Conservation Area is closely related to the three places of worship situated within the area. The proposed development would harm the ability to appreciate two of those in Bevis Marks Synagogue and St Botolph's Church which fall within the Georgian Group's statutory remit. The Group defers to the expertise of our sister National Amenity Societies on buildings which fall outside of our remit.

A further characteristic that contributes to the special interest of the conservation area is the proliferation of historic open spaces including the courtyard of Bevis Marks Synagogue. The proposed development would have a negative impact, as referred to above, on the courtyard of Bevis Marks, and the churchyard of St Botolph's owing to the impact on their setting which in turn would cause harm to the character and appearance of the Creechurch Conservation Area.

It is evident from the views submitted within the HTVIA that the proposed development would pose an incongruous element to the area and would harm the prevailing character and appearance of the Creechurch Conservation Area. The level of harm would be at the upper end of less than substantial harm, boarding on substantial.

Policy and Guidance

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, when considering whether to grant listed building consent, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Regarding planning permission, section 66(1) of the Act makes it a statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified

as less than substantial, then in line with paragraph 208 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise'.

London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.'

Policy D9 Tall Buildings within the London Plan requires Development Plans to define what is considered a tall building and for local authorities to determine where they are appropriate and where they are not. It goes on to state that 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'. The policy concerning heritage assets states that 'proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area'.

The City of London's Local Plan Core Strategic Policy CS12 sets out the City's objective to 'conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors'.

Policy CS13 states the City's objective to 'protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks'.

Core Strategic Policy CS14 states that in relation to tall buildings, planning permission will be refused if they are located within inappropriate areas such as conservation areas. Within the same policy, consideration will also be given to 'the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features'.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced

by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

The Georgian Group's Recommendation

The proposals would cause harm to the significance of Bevis Mark Synagogue, St Botolph's church and the Creechurch Conservation Area and would therefore be contrary to legislation as well as national and local policy as set out above.

The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

Edward Waller (Conservation Adviser for London and South East England)

Date: 08 May 2024
Our ref: 470087
Your ref: 24/00021/FULEIA & 24/00011/LBC

City of London

BY EMAIL ONLY
lpaburystreet@cityoflondon.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

Thank you for your consultation on the above dated 14 March 2024 which was received by Natural England on 14 March 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Helen Churchill
Consultations Team

Anna Tastsoglou
Environment Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Housing and Regeneration Directorate
Planning and Building Control

Development Management
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Date: 14 May 2024

Dear Anna Tastsoglou,

CITY OF LONDON REF(S): 24/00021/FULEIA and 24/00011/LBC

TOWER HAMLETS REF: PA/24/00441

ADDRESS: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

PROPOSAL:

24/00021/FULEIA – Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

24/00011/LBC – Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Thank you for your correspondence dated 14th March 2024, informing the London Borough of Tower Hamlets (LBTH) about the City of London's receipt of the aforementioned Planning application and Listed Building Consent.

LBTH previously voiced strong objections to a similar application at Bury House, 31 Bury Street, between 2020-2021 (City of London ref: 20/00848/FULEIA and LBTH refs: PA/20/02417, PA/21/00436, and PA/21/01930). These concerns remain.

While it is noted that the current proposal now includes adjacent Holland House (Grade II*) and Renown House, our primary concerns pertain to the replacement building for Bury House.

Despite minor adjustments, the replacement building maintains its design as a tall, slender tower situated to the southeast of the Gherkin. Although the maximum height has been marginally reduced from 197.94m AOD to 178.7m AOD, and a stepped form introduced to the upper sections, these modifications do little to alleviate the impact on the Tower of London World Heritage Site (WHS).

As illustrated in LVMF View 10A.1 in Figure 5.4 of the Tower of London Heritage Impact Assessment, despite the reduced height and massing, the proposed development would still disrupt the clear sky gap between the City Cluster and the Tower of London, encroaching inappropriately and competing with the iconic White Tower.

Consequently, LBTH maintains its objection to the proposals, expressing concerns that, even with amendments, the proposed development would significantly and detrimentally affect the setting of the Grade I listed Tower of London WHS and its townscape views.

These proposals severely risk diminishing the ability to appreciate the Outstanding Universal Value of the Tower of London WHS.

Yours sincerely,

Catarina Cheung
Planning Officer
For and on behalf of The Director of Planning and Building Control
The London Borough of Tower Hamlets

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

HISTORIC ROYAL PALACES

Development Division
City of London
PO Box 270
Guildhall
London EC2P 2EJ

FAO Ms Anna Tastsoglou
By email to lpaburystreet@cityoflondon.gov.uk

13 May 2024

Bury House, Bury Street, London EC3A 5AR

Planning Ref: 24/00021/FULEIA and 24/00011/LBC

Dear Madam

Thank you for your notification letter of 14th March inviting Historic Royal Palaces to submit observations by 15 May 2024.

As guardians of the Tower of London WHS we write to object to the revised proposals for this site. It is evident from the submission material that the proposed development would have a significant damaging visual effect on aspects of the 'Outstanding Universal Value' (OUV) of the Tower WHS. On the basis of the information available on the City's website, our comments on the proposal are set out below and we would ask that these are considered in the Council's determination of the application.

On 19th November 2020 we objected to the previous application for this site (20/00848/FULEIA) for which ICOMOS conducted a Technical Review and for which Planning Permission was refused. In our view, the reduction in the height of the building from 48 storeys to 43 storeys is not sufficient to mitigate the harmful impact on the OUV of the WHS and overcome the previous reason for refusal in this regard. Particularly on the attributes of the Landmark Siting of the Tower of London and on the Physical Dominance of the White Tower.

In the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge it is imperative that adequate visual separation is maintained between the City Cluster and the White Tower silhouette. The proposal retains just a sliver of sky space to separate it, but of course this view, like any other, is not static: move a few metres north and the proposal would appear to rise directly out of the White Tower.

The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily

Historic Royal Palaces
Tel +44(0)20 3166 6000 www.hrp.org.uk
Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)
The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

understood. This understanding and appreciation is enhanced by the free sky space around the White Tower' Where it has been compromised its visual dominance has been devalued.'

Regarding the background to the Tower, the LVMF guidance notes, 'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site'.

It should be borne in mind that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The new proposal for Bury House, would still inevitably increase the existing compromise of the free space around the White Tower.

In Historic Royal Palaces' view, the damaging visual impacts are also evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA views 22 and 23), increasing the visual intrusion of the modern city skyline into the inner ward.

A key impact of the proposed development would be that it would inevitably extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the burgeoning City. Although there has been a minor decrease in the proposals' height, it still creates an abrupt vertical cliff edge in LVMF 10A.1, rather than a stepping down into the 'foothills' of the Cluster. This is a contradiction in the principles being set out for the Cluster and the proposal is also still high enough to suggest that there should be a further continuation of the downward slope of the Cluster towards the White Tower – which over the years has pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.

You will note that in their 2022 Technical Review, ICOMOS restated the position from the 2019 Review that "the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional

HISTORIC ROYAL PALACES

challenges to it. Neither is it an acceptable 30 City of London ref: 18/01213/FULEIA 12 approach to allow further negative visual impact on the property's integrity when it is already threatened." This position still stands for the current application and the impact of the development as proposed would be of significant heritage harm to the setting of the Tower of London and the Outstanding Universal Value of the World Heritage Site. On this basis the proposals are contrary to the policies of the Local Plan, London Plan and NPPF, whilst the scheme does not deliver sufficient public benefits to outweigh the level of harm created.

The Planning Statement submitted with the planning application relies significantly on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal. However, given that the draft plan remains at an early stage of preparation, having not been submitted or tested through examination, with significant objections remaining to the tall buildings policies and proposals in the draft document, it is evident that limited weight can be attributed to the draft plan in the determination of the application at this stage.

Historic Royal Palaces therefore objects to the proposed development, which would be harmful to the OUV of the Tower of London WHS and we ask the City of London to refuse the application.

Yours faithfully

[redacted]

Adrian Phillips
Palaces & Collections Director
[redacted]

Transport for London

Our ref: CITY 24/15
Your ref: 24/00021/FULEIA

Transport for London
Borough Planning

5 Endeavour Square
Westfield Avenue,
Stratford, London
E20 1JN
Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

Anna Tastsoglou
City of London Corporation

14 May 2024

Dear Anna

1 - 4, 31 - 34 Bury Street, London, EC3A 5AR City of London E1W 2BX– TfL's Detailed comments

Thank you for consulting TfL about this referable planning application. It is understood that the proposal includes the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

These comments follow the Mayor's recent consideration of the case at stage 1. TfL is in receipt of the Transport Assessment, dated January 2024, Planning Statement, dated January 2024; and other associated document. These form the basis of the response below.

Site location

The site is bounded by Bury Street to northwest and south; and Creechurch Lane to the south-east. The nearest part of the Transport for London Road Network (TLRN) is the A10 Bishopsgate, 200m to the west.

The site is served numerous London Underground, DLR and National rail services within walking distance, including Liverpool Street Rail and Underground Station, Bank Underground Station, Aldgate Underground Station, Aldgate East Underground Station, Tower Hill Underground Station, Tower Gateway DLR Station, and Fenchurch Street Rail Station. The site is also served by numerous bus services with bus stops within a short walking distance. As such, the site records an excellent public transport access level (PTAL) of 6B, which 0 is the lowest and 6b is the highest.

The Cycleway CS2 is located approximately 400m east of the site. A southern extension of Cycleway 1 (C1) through Bank, past Liverpool Street station, along Eldon Street and

then along London Wall and Bevis Marks gyratory was recently funded through the latest City of London Local transport Implementation Plan.

In addition, there are three TfL Cycle hire docking stations locating within 200m of site which are St Mary's Axe, Houndsditch, and Jewry Street cycle hire docking stations.

Access and parking

Pedestrian Access

It is proposed that the proposed development will enable access through James' Court (to the south) and also through Heneage Place (to the north) as part of new public route through the building (7am – 11pm). Office access 'out of hours' will be via the Creechurch Lane entrance (to the east). Public and retail uses are accessible wrapping around to the west directly to Renown House and Holland House. This will significantly improve permeability of the site and increase the overall space available for pedestrian movement between Heneage Place and Bury Street and along Creechurch Lane; which is welcomed in line with London Plan policy T2 Heathy Street.

A Pedestrian Comfort Level analysis has been undertaken for 13 section of local streets in the vicinity of the site. It is considered that the streets to be used as the main route for access would be able to accommodate the additional footfall and without adverse impacting the PCLS with B+ rating maintained, while the narrower minor routes would not see any notable increase in footway nevertheless.

Cycle and vehicle Access

Cycle parking access will be via Creechurch Lane at the north-east corner of the building. The entrance provided is dedicated for cyclists which is separated from the pedestrian entrance. The entrance is equipped with a sliding door and stairs with a wheeling channel to access basement B1 and B1 Mezzanine. An alternative cycle access is provided via a lift to the basement within the north core for those not wanting to use the staircases. In addition, A secondary access for cycle parking is provided via the eastern Holland House entrance, off James' Court, via lift or stair, this welcomed.

Vehicle Access

TfL welcomes that an off-street servicing area at the north west corner of the site is provided to serve Bury House, Holland House and Renown House, in line with London Plan Policy T7 Delivery & Servicing, and is accessed directly via Heneage Lane. Having said that, Stage 1 Road Safety audit is required to support its acceptability in highway safety terms.

Cycle Parking

A total of 667 cycle parking spaces will be provided, of which 585 spaces will be for long stay spaces, and 85 short stay spaces.

It is also proposed that 5% (29 spaces) will be provided the form of adaptable spaces to accommodate users of larger / unconventional cycles and those with mobility impairments. The remaining spaces will be in the form of Sheffield

Stands (87spaces), and Fold bike lockers (58) and 1 High Density solution type space.

Alongside with long stay cycle space, the short stay spaces will be provided within the basement level 1 (B1) and B1 mezzanine level accessed via the Creechurch Lane cycle entrances. All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5 Cycling and London Plan cycle parking standards.

Car Parking

TfL welcomes that no on-site car parking has been proposed as the proposal will be 'car free'. As per current, on-street blue badge parking spaces are available on Creechurch Lane and Mitre Street.

.

Healthy Street & Vision Zero

An Active Travel Zone assessment (ATZ) has been undertaken and seven routes has been reviewed. The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc.

Since part of the land use of the proposed development would be for flexible community/education/ cultural/amenity use; therefore TfL considers that an Night-time ATZ shall also be carried out to assess routes for darker hours, ensuring safety and security for vulnerable users.

TfL is developing safety improvement proposal for the A10 Bishopsgate, the estimate cost of the project is currently £1.5m, therefore a partial contribution of £350K is sought from this proposal toward the project, the amount of contributions is based on common approach adopted for proposed developments in the area.

The City Corporation is encouraged to secure necessary improvements for work on its highway network accordingly.

Trip generation

The submitted TA expected that the proposal would generate a total of 966 two-way trips are forecasted in the AM Peak (08:00-09:00) and 955 two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 690 two-way persons trips during the peaks compare with the existing offices. This assessment is considered robust and is therefore accepted. A lower level of trips is also expected for the proposed retail use, which is not considered significant.

Mode share

It is also predicted that vast majority of the trips to/ from the proposal will be by sustainable transport modes. Of those, nearly 10%% of trips will be by bike or on foot, and 7% will be by bus, 38% by tube and 47% by rail (including Elizabeth Line); and the level of car and taxi trips are negligible.

Public Transport service

The site is already with a very high level of public transport services; it is therefore considered that the proposal would not give rise to significant adverse impact to existing London Underground and local bus services in City area.

London Cycle Hire
It is estimated that the proposal would generate an additional 309 two-ways cycle trips over the current proposal, which means additional demand for cycle hire services. A financial contribution of £100K and land to construct additional docking station on footprint or as close to it as possible is therefore sought. The applicant is urged to identify a mutually agreeable location that would be accepted by the City Corporation and TfL

Delivery & Servicing
It is welcomed that at at-grade off-street on-site service yard will be provided for servicing, access from Heneage Place. A draft Delivery and Servicing Plan (DSP) has been submitted, which outlines the servicing arrangement for the proposal, includes consolidation and restricting servicing vehicle size of goods vehicle of up to 7.5T with 8m maximum length, this is due to the restricted width of Heneage Lane and the vehicle weight limit. However, the DSP shall also promote the use of cycle servicing to reduce goods vehicle traffic in the City and be more sustainable; as well as enabling night-time servicing to reduce traffic impact during normal business hours. The DSP should therefore be revised the comments above, and the final detailed DSP should be secured by pre-occupation condition.

Construction Logistics
A Detailed Construction Logistics Plan (DSP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition.

Travel Planning
A Framework Travel Plan have been submitted which is welcomed. It is considered that the 5 years mode shift targets to walking and cycling should be more ambitious to achieve the Mayors' long terms aspiration for 80% sustainable travel by 2041.

The Travel Plan should therefore be revised to reflect the comments above, and the finalised Plan should be secured by s106 planning obligation.

Community Infrastructure Levy
The MCIL2 rate for City of London is £80 per square metre.

Summary
The following matters should be resolved before the application can be considered in line with the transport policies of London Plan;

1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreement'
2. Undertake Stage 1 Road Safety Audit for the proposed servicing access
3. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ.

4. Secure a partial financial contribution of £100K for TfL toward proposed A10 Bishopsgate improvement.
5. Secure the submission and approval of cycle parking details by condition.
6. Secure £100K (index linked) financial contribution toward enhancing local cycle hire services.
7. Revise the DSP in light of comments, and secure approval of both DSP and CLP by conditions.
8. Revise the Travel Plan, and ensure that the Plan would contribute positively toward the Mayor's sustainable travel goal and secure them by s106 agreement; and
9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.

I trust that these comments are of assistance. If you have any further queries, please let me know.

Yours sincerely,

PakLim Wong
Planner
Email: [redacted]

From: Christina Emerson <[redacted]
Sent: Tuesday, May 14, 2024 5:41 PM
To: Tastsoglou, Anna <[redacted]>
Subject: Bury House, 31 Bury Street, City of London, EC31 5AR 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Your ref: 24/00021/FULEIA
Our ref: 193045

Bury House, 31 Bury Street, City of London, EC31 5AR
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings

Dear Ms Tastsoglou,

The SPAB has been made aware of the above application and is writing to register its strong objection on the basis of the serious harm that would be caused to the Bevis Marks Synagogue and the Creechurch Conservation area.

The proposal for a 45 storey office block at 31 Bury Street bears striking similarities to the highly controversial scheme which was refused by your authority in 2022. The major area of difference would appear to be the justification offered by the applicant for the scheme. Much is made of the new building's sustainability credentials, the economic benefits that would flow from it, and the provision of space for a variety of community uses. In our view, these arguments are tenuous at best and do not provide adequate justification for the substantial harm that would be caused to the Synagogue and the conservation area.

Any new building of the type proposed would be expected to demonstrate solid sustainability credentials, so this cannot be considered as a determining factor when weighing justification against harm to an exceptional heritage asset. Also, and quite simply, the most sustainable building is one that already exists and we cannot see that the applicant has fully understood or explained the total carbon lifecycle cost of the proposed development.

We are also not convinced that there is a requirement for community usage on the scale envisaged by the applicants, and indeed the location of our own offices in the City of London allows us to witness on a daily basis the many underused and often cavernous 'community' spaces that now occupy the ground floor of tall buildings at the expense of genuinely useful and affordable small scale businesses and community premises.

The previous application was rightly refused by your Planning Committee based on the serious harm that would have been caused to the Synagogue. To that harm must now be added the very damaging impact on the newly designated Creechurch Conservation Area that would result if the application were granted. The height, scale, and mass of the proposed tower would overwhelm the Conservation Area and cause a high level of harm to key views. We cannot think of any precedent that would support your Authority in granting a permission that would be so clearly in contravention of the requirement of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that special attention must be paid to the desirability of preserving or enhancing the character or appearance of the area. Indeed, doing so would set a very damaging precedent.

The SPAB urges that the application be refused by your local authority.

With best wishes

Christina Emerson
Head of Casework
[redacted]

The Society for the Protection of Ancient Buildings (SPAB)
37 Spital Square, London E1 6DY | 020 7456 0916 | spab.org.uk
Follow @spab1877 on Instagram | Facebook | Twitter/X | LinkedIn


CITY
of
LONDON

CAROE
ARCHITECTURE

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St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: [redacted]
Web: www.caroe.com

Anna Tatsoglou
Development Division
City of London
Sent via email only

15 April 2024

Dear Anna,

Letter of Planning Application Response: 1-4, 31-34 Bury Street (ref. 24/00021/FULEIA and ref. 24/00011/LBC)

Introduction

Further to a review of the submission documents, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposals for a new tall building at the above site.

Background

We would here note that we have not been approached for pre-application discussion regarding this project. The Cathedral always welcomes the opportunity to provide constructive feedback on emerging proposals within the setting of St Paul's. We regret that this did not occur.

We note that this application was subject to an Environmental Impact Assessment. At the time of writing we are not aware that we were consulted on the scoping report for that EIA. As will be apparent in our comments which follow, we are not altogether content with aspects of the applicant's documentation and impact evaluation, which might have been addressed by the EIA scoping assessment.

Comment

The proposals involve the construction of a new tall building to Bury Street, on the eastern end of the cluster.

Whilst the development site is separated visually from the Cathedral by the bulk of the Cluster, the proposals will still be appreciable in key views of St Paul's (as identified within the *Heritage, Townscape and Visual Impact Assessment* - HTVIA) and thus form part of its setting. We would therefore query why an assessment of the significance of the Cathedral (including the

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269; Lewis House, Great Chesterford, Essex CB10 1PF

contribution made by its setting) and subsequent heritage impact assessment was not explicitly included in the application documents, either within the HTVIA prepared by The Townscape Consultancy or the Heritage Statement prepared by KM Heritage. We would suggest that such assessment should be included in the submission documentation as a matter of due course given the exceptional significance of the Grade I listed building and the evolving nature of its setting. If this assessment is not included, we consider that explicit mention should be made of why the Cathedral was scoped out of assessment in order to fully understand the extent of potential heritage impact.

We do, however welcome the inclusion of key views of the Cathedral outlined in the 'Visual Assessment' section of the HTVIA. Whilst we understand that the proposals are located on the eastern side of the cluster and a 'partial' ZTV is included as an appendix to the HTVIA, the inclusion of a ZTV that covers a wider area would be of great assistance in understanding the extents of potential visual impact, and why certain strategic views (such as view 15B.2) were not taken forward for assessment.

Fleet Street views are not included within the HTVIA. However, the Processional Way along Fleet Street is an incredibly sensitive area of the setting of the Cathedral in terms of potential heritage and visual impact. We would therefore also seek to be assured that there is absolutely no visual intrusion within views of the Cathedral from Fleet Street.

Wider Considerations: Bevis Marks

We have confined our observations on this application to our primary locus (ie concern for the heritage and setting of St Paul's) and our well established planning application review methodology. However we also feel we would be remiss in not making mention of the evident impacts that this major development proposal has on both the Tower of London (WHS) and Bevis Marks Synagogue.

The City Planning and Transportation Committee refused consent for an earlier proposal – which, to most observers, is more or less similar to the current application. The committee determined that the impact on the heritage and setting of two highly significant and sensitive Grade 1 listed heritage assets were found to be unacceptable.

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Accepting that other commentators and critics, including Historic England, will be better placed to advise Planning Committee on the methodology and evaluation of impacts of this development on Bevis Marks especially: the main observation that we wish to add to our comments here is in relation to the definition and understanding of 'setting'. There is very good guidance from HE on evaluation and consideration of managing significance, which includes 'setting' in GPA 1 and 2. We feel that it is important to note that, whilst the Tower and St Paul's are (in different ways) privileged with specific heritage management policies that broadly recognise these internationally significant heritage assets, Bevis Marks has to argue a case for 'Protection, Preservation and Celebration' within the rubric of the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990.

All participants will rightly be concerned with seeking a better and shared understanding of the heritage setting of the Synagogue and, to date, it would appear that the regulators and proposers of this scheme have not yet arrived at a shared understanding of setting and the significance thereof. This important consideration might have been addressed by EIA Scoping.

Where the interests of St Paul's and those of Bevis Marks intersect, we suggest and as noted above, is that this application before committee does not appear to be supported by sufficient or proportionate evidence and expertise in relation to the full and correct evaluation of the heritage context into which this major project intrudes. We would therefore urge officers and Committee to allow for these necessary data to emerge to inform any determination.

Conclusion

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward. We would happy to review any additional information submitted to better understand potential impacts.

Yours sincerely,

[redacted]

Surveyor to the Fabric

cc: Tom Nancollas, Deputy Director (Design), City of London
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Historic England

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City of London Corporation
Environment Department
PO Box 270, Guildhall
London
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Direct Dial: 020 7973 3091

Our ref: L01574353

15 May 2024

Dear Ms Tastsoglou

Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

HOLLAND HOUSE 1 - 4, 32 BURY STREET LONDON EC3A 5AW
Application Nos 24/00011/LBC & 24/00021/FULEIA

Thank you for your letters of 14 March 2024 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall building would have harmed the Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard.

The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal in our view. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective.

Historic England objects strongly to the applications and recommends they should be withdrawn or refused.

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Historic England Advice

Significance of the heritage assets

a) Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value as an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. They reflect the Tower's role as the setting of many significant episodes of European history and as one of the best surviving examples of a medieval fortress palace in the world. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. The World Heritage Site (WHS) is located approximately 550m south-east of the development site.

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value (OUV). The Statement of OUV adopted by the World Heritage Committee, in the section relating to integrity, notes that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), is historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower's attributes as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance.

These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they 'rely to a great extent on its setting' (IR 14.25) and, of the latter three attributes, 'the sky space component…is central to its OUV' (IR 14.29).

The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London.

b) Bevis Marks Synagogue (Grade I listed)

Bevis Marks Synagogue is the oldest surviving synagogue in the United Kingdom. It was built between 1699-1701 for a growing Sephardi community in the City of London,

following the Resettlement of the Jews in England in the 1650s. The synagogue has been described as the ‘Cathedral’ Synagogue to Anglo Jewry, such is its stature and symbolic importance.

The synagogue is a key part of the history of British Judaism and is of international importance, particularly given its roots in the Sephardi diaspora created by the expulsion of Jews from the Iberian Peninsula in 1492. The synagogue continues the traditions of those communities who travelled to the Low Countries and is now one of the oldest continually functioning synagogues in Europe.

The synagogue is remarkably little altered. Its architectural and historic significance, including its communal value is clearly exceptional and it is Grade I listed for that reason. Its setting, whilst somewhat compromised by the evolving City around it, continues to make an important contribution to its architectural and historic significance and the ability to appreciate that significance.

The premier example of early synagogue architecture in England, Bevis Marks Synagogue was built by the master craftsman Joseph Avis who worked closely with both Sir Christopher Wren and Robert Hooke elsewhere in the City. It is a simple, well-proportioned classical building executed in brick and shares much in common with the style preferred for public buildings and churches, designed by the likes of Wren, at the time.

Perhaps the most striking way that the synagogue is externally distinguishable from these places of worship is by its discrete siting away from the street in a small courtyard. Its hidden away location suggests a degree of caution, or limitation, for a place of worship (particularly when compared to the near contemporary Sephardi synagogue in Amsterdam). Nevertheless, the high-quality architecture was a demonstration of their faith and an investment which suggests the congregation were confident that they would remain welcome in London. In this way architecture was used by the Sephardi community to establish a positive identity, and permanence, within society.

Historically, the synagogue formed part of a wider estate with lower rise community buildings encircling it. Despite modern development largely replacing the former one and two storey ranges, the form of the courtyard remains, and the enclosure continues to provide separation from the outside world. The synagogue is the pre-eminent feature of the space, reflecting its function and status. It is currently seen with a largely clear sky backdrop which enhances its presence.

The adopted Conservation Management Plan (CMP 2019) for the synagogue notes that the courtyard represents an arresting point of departure from the modern world into what is palpably a historic place. It states that ‘views across and out of the courtyard, as well as visibility of the sky are important contributors to the setting of the

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synagogue, as well as the courtyard's amenity value.' We note that the synagogue has liturgical practices which include interactions with the sky and celestial bodies. The CMP further explains the communal significance of the courtyard as a place where people gather before and after services and other events, including weddings. It therefore has a key role in supporting the customs and traditions of the synagogue.

Modern development, including tall buildings, is increasingly visible in the wider setting of the synagogue. Where tall buildings encroach into the skyspace around the courtyard and have windows facing into it, they reduce its special sense of privacy and openness to the sky. This makes elements of the setting particularly sensitive to further erosion or loss. The synagogue nevertheless continues to benefit from a large amount of clear sky making a strong positive contribution to the buildings setting and significance, and the ability to appreciate these.

c) The site - Holland House (Grade II* listed), Renown House and Bury House

Holland House was designed as the London headquarters of W.M. Müller & Co by the preeminent Dutch architect H.P. Berlage, from 1913-16. It is a highly original office design and the only example of his work in the country. This building is now prominently sited, following the construction of the Gherkin and the creation of the public space around it which has enhanced the ability to appreciate its significance.

It is an important building particularly because of its pioneering approach to rational façade design. The primary elevation has a regular grid without any apparent hierarchy - radical for its time. The realised design was unprecedented in London, reflecting Berlage's interest in contemporary American architecture and his own progressive ideas. The building is of more than special interest which is reflected by its Grade II* designation.

Holland House wraps around the slightly earlier 33-34 Bury St (Renown House) to the south, a good quality but unlisted commercial building of 1912 (designed by the architect Delissa Joseph). It contributes positively to the setting of Holland House. Despite being separated by only a few years, the traditional architectural language of Renown House, including the hierarchical arrangement of its floor levels as expressed in its composition, contrasts unmistakably with the radical approach to façade design pursued at Holland House. This juxtaposition enhances the appreciation of the latter's significance.

31 Bury Street (Bury House) is a late 60's office building. While its design is of no particular merit, it is sympathetic in scale to its historic neighbours. Bury House is physically connected to Holland House, which also has alterations and extensions contemporary with the former that detract from the listed building's significance.

d) Creechurch Conservation Area

Recently designated for its special architectural and historic interest, the Creechurch Conservation Area's character is embodied in three exceptional Grade I listed places of worship: Bevis Marks Synagogue, the churches of St Katherine Cree and St Botolph-without Aldgate. Alongside these are high quality commercial buildings and warehouses from the late-nineteenth and early-twentieth centuries. Subsequent modern development is generally sympathetic to the historic scale, resulting in a clearly defined character worthy of preservation. The tall building at 1 Creechurch Place is an outlier which detracts considerably from the area's qualities.

Holland House, Renown House and Bevis Marks Synagogue make a strong positive contribution to the conservation area's special architectural and historic interest. Although Bury House may not make a distinct positive contribution, its perceived scale is sympathetic to its neighbours and the area more broadly. The loss of James Court and the southern part of Heneage Lane caused by its construction has interrupted the historic urban grain to a small extent.

Impact of the proposals

The proposals are for the replacement of Bury House with a new 44 storey building (178.7m AOD) and the alteration and extension of Holland House and Renown House.

a) Tower of London World Heritage Site

The current proposals show a modest reduction in height and a chamfering of the massing at the uppermost part of the building, compared to the refused scheme. The proposed tower would, though, be slightly wider than the previous scheme in its middle section. We conclude the proposals would cause a similar level of harm to OUV as the previously refused scheme.

While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower's turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height.

Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also standout from the Cluster due to the proposed cladding material. The additional height that would be introduced at its eastern edge, would result in a striking upward step in scale directly beside the White Tower, creating much more of a cliff edge than the current situation.

It would therefore present a greater distraction and harm the Tower's attributes of OUV as a symbol of Norman power, its landmark siting and its physical dominance, and so harming the integrity of the WHS. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above.

The experience from Tower Bridge is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it.

The proposals would introduce a comparable scale and mass to the Gherkin, evident notably closer to the Tower, leaving less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City and its silhouette would be further compromised when compared to the existing situation, adding to the harm to the attributes of OUV we have identified above.

The proposed development would also be visible within the Tower of London Inner Ward. At different points it would appear above the roofline of the Chapel Royal of St. Peter ad Vincula and 2 Tower Green (both Grade I listed), adding further to the visual intrusions of various tall buildings in the City. Consequently, it would further diminish the self-contained ensemble of historic buildings and spaces, distracting from the Tower's remarkable sense of place.

b) Bevis Marks Synagogue

The proposed development would harm the significance of the synagogue, intruding directly behind it when viewed from its courtyard. The new tower would appear closer to the synagogue than any other existing tall building development, greatly reducing the clear sky backdrop, resulting in a worse scenario than the previously refused application proposals.

The ability to appreciate the architectural interest of the synagogue would consequently be diminished. Its precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale. The new tall building would become a dominant feature of the courtyard at the expense of the synagogue, diminishing the latter's role as the focal point of the space.

The special historic character of the place and the deliberate sense of separation from the outside world would be further diminished. The ability to see clear sky from the courtyard would also be lost, breaking the visual link between the space and celestial bodies.

Such harm needs to be considered in a cumulative context, with existing and consented tall buildings already having a damaging impact. These proposals would cause a greater degree of harm than those schemes, because of the location of the development site relative to the synagogue, evident immediately upon entering the courtyard.

c) Holland House and Renown House

Holland and Renown House would be altered in order to combine them with the proposed tall building on the site of Bury House. We note as heritage benefits the conservation works and proposed increased access, which would improve the ability to appreciate the significance of Holland House. However, the alterations would include the demolition of party walls in order to provide better connectivity and to enable a shared core. The light well in Holland House would be extended and subdivided. These alterations would result in harm to Holland House by compromising the legibility of its historic design.

Both Holland House and Renown House would be extended upwards which would result in a greater level of harm to the listed building and to the conservation area. In the case of Holland House, the addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing.

The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height.

The proposed tall building would appear to tower over Holland House distracting from an appreciation of its high architectural interest, causing further harm.

d) Creechurch Conservation Area

The proposals would similarly harm the conservation area by reducing the positive contribution made to it by these buildings. The scale of the proposed tall building would detract from a relatively consistent historic scale and become the dominant form.

We note proposals offer modest enhancement to the character and appearance of the area by reinstating the southern part of Heneage Lane as a route through, which would be a small heritage benefit.

<u>Legislation, policy and guidance considerations</u>

We note the salient points of law, policy and relevant guidance here.

a) The Planning (Listed Buildings and Conservation Areas) Act 1990

Section 16 (2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the statutory duty on local planning authorities to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Section 72 (1) of the Act also requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

b) The City of London Plan 2015 - 2026

The Local Plan context affords considerable protection to the Tower of London and Bevis Marks Synagogue, befitting their status as heritage assets of the highest significance.

According to the City of London's adopted Local Plan, the site is within the broad area identified for tall buildings in the Cluster. This is set out in the adopted Plan in Core Strategic Policy CS7: Eastern Cluster, which seeks the provision of high quality tall commercial buildings within the cluster area on appropriate sites and adhere to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views. This policy therefore recognises that not all sites within the Cluster area are suitable for tall buildings.

Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value…of the Tower of London World Heritage Site and its local setting." It states that "development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area"

Policy CS13: Protected Views, aims "to protect and enhance significant City and London views of important buildings, townscape and skylines…by…securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."

Policy CS14: Tall Buildings, states that such development will only be permitted on sites that are considered suitable, having regard to the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. The policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

c) The London Plan 2021

London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

London Plan Policy D3 requires all development to follow a design-led approach that optimises the capacity of sites, including consideration of design options to determine the most appropriate form of development that responds to a site's context.

London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the policy reserves the strongest protection, stating that new tall buildings "must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it".

The Tower of London is identified in the London Plan as one of three Strategically Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the London View Management Framework (LVMF Supplementary Planning Guidance, 2012).

The LVMF supplementary planning guidance, in relation to view 10A, states that this location "enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised, its visual dominance has been devalued" (para. 182).

It requires that “the Tower of London should not be dominated by new development close to it” (para. 183) and that “some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background” (para. 186).

d) The National Planning Policy Framework

The National Planning Policy Framework (NPPF) requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Paragraphs 200-201).

Any finding of harm is a consideration to which the decision-maker must give “considerable importance and weight” and “less than substantial harm” in NPPF terms does not imply “a less than substantial objection”.

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

e) The Tower of London World Heritage Site Management Plan 2016

The management plan states that “the greatest challenge to the WHS… remains the impact on its setting of development and tall buildings” (p.4). Key elements of the Tower’s setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 (p.99) and 7.3.27 (p.101), namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower’s relationship with the City can be understood by the sky space around the White Tower.

f) The Tower of London Local Setting Study (2010)

The Local Setting Study supports the management plan policies. In relation to the view from Tower Bridge, it notes that the existing Cluster buildings appear to move closer to the White Tower, ‘towering’ over it, which reduces its apparent prominence and scale. It states that the White Tower should not become ‘lost’ in the City and that additional buildings in the backdrop (‘behind’ *or* ‘close’) could further diminish its perceived scale.

g) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3)

The Setting of Heritage Assets recommends a staged approach to understanding impacts on setting. Step 2 of that guidance is an assessment of the degree to which settings and views contribute to significance or allow it to be appreciated. This includes consideration of ‘the asset’s intangible associations with its surroundings, and patterns of use’; a further non-exhaustive checklist of possible attributes of setting is also provided. Those that may be applicable in this case, relate to the experience of the asset, including the following:

- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Sense of enclosure, seclusion, intimacy or privacy
- Rarity of comparable survivals of setting
- Traditions

Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- Proximity to asset
- Position in relation to key views to, from and across
- Prominence, dominance or conspicuousness

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- § Competition with or distraction from the asset
- § Change to skyline, silhouette
- § Lighting effects and ‘light spill’

Historic England’s position

Historic England objects strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, contrary to planning legislation, policy and guidance. We do not support the development of a building of scale proposed in this location due to the inevitable harmful impact it would have on the historic environment.

The reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard.

a) The Tower of London World Heritage Site

The previously refused application was subject to a Technical Review by ICOMOS, one of the Advisory Bodies to UNESCO’s World Heritage Committee, in July 2022. Given the similarities between the current scheme and the refused one, we consider that ICOMOS' previous advice remains relevant to the current application and should similarly be taken into consideration. ICOMOS considered that the proposals would harm the integrity of the WHS as well as the significance it derives from attributes conveying its OUV.

This harm remains in the current planning application. In the case of the World Heritage Site, a small reduction in height of the proposed tall building (without an apparent loss of deliverable office floor space) causes a similar impact. The same attributes of OUV (as a symbol of Norman power, its landmark siting and its physical dominance) and so the integrity of the WHS, would be harmed.

The submitted Heritage Impact Assessment for the Tower does not consider the potential for negative impacts on OUV and we disagree strongly with its conclusion of a minor and beneficial impact in LVMF View 10A.1. It does not adequately consider the impact on the important kinetic experience of the viewpoint either. In their technical review, on this point ICOMOS stated that ‘the work to maintain a separateness from the Tower is completely unsuccessful’. The same is true of these proposals.

The City’s adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City’s historic environment and its skyline, including the OUV of

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the Tower. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

We consider that, despite the changes to the scheme, a high level of harm would be caused to the same attributes of the WHS' OUV. For the purposes of the NPPF, we find that the harm would be in the middle of the less than substantial range to the World Heritage Site. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals.

Notwithstanding our view that the advice received from ICOMOS on the previous scheme for this site remains relevant, the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the World Heritage Convention, has decided to notify the current case to UNESCO. We consider that any decision on this application would benefit from knowing the position of the World Heritage Centre and/or further advice of ICOMOS. We note that we have received request from the World Heritage Centre to produce a State of Conservation Report for the Tower of London this year, indicating that UNESCO has serious concerns about the impacts of development on the setting of this WHS and its OUV.

b) Bevis Marks Synagogue

Our understanding of the significance of the synagogue has developed since the previous application. Clear harm would be caused to multiple aspects of the synagogue's significance by blocking the open sky in its backdrop - noting in particular the considerations set out in GPA3 and the assessment of significance in the adopted CMP. We defer to the expertise of the Sephardi community on the aspects of significance that are associated with their religious customs and traditions that may be impacted by the current proposals.

We think that the harm arising from the proposals would be greater than we previously identified. The harm would fall in the middle of the less than substantial range, which represents a considerable impact to a building and setting of exceptional significance and rarity, which are sensitive to change.

The submitted Heritage and Townscape Visual Impact Assessment presents a limited understanding of the significance of the synagogue, and the contribution made by setting to that significance. It does not explain why a different understanding to the adopted CMP has been reached with regard to the value of the sky. We consider that the application fails to meet the requirements of Paragraph 200 of the NPPF, as the level of detail is not sufficient.

c) Holland House, Renown House and Creechurch Conservation Area

New additional harmful impacts to the historic environment arise through the present applications in the case of Holland House and the newly designated Creechurch Conservation Area, as described above. The proposed roof extensions have not been resolved in a way which avoids or minimises harm in accordance with the requirements of the NPPF. Given its importance as a pioneering building, we think that such harm is difficult to justify.

The introduction of a tall building within the conservation area would harm its character and is at odds with the provisions of Local Plan Policy CS12 and CS14. The latter indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

d) Design and heritage benefits

We are not convinced that sufficient steps have been taken to minimise or avoid conflicts between the conservation of all of the designated heritage assets referred to above, as required by the NPPF.

As context (including the historic environment, as set out in the NDG) is a fundamental aspect of good design, we find that the design quality is poor in this respect. Similarly, the proposals do not appear to comply with the design-led approach required by London Plan Policy D3, as the site's capacity has not been optimised with regard to the site's context and capacity for growth, including the setting of such exceptional heritage assets, which are an important consideration.

The heritage benefits arising from the scheme are limited and could be achieved in less harmful ways. We afford them little weight and consider them incapable of outweighing the identified harm.

Recommendation

Historic England strongly objects to these applications. We recommend that they are refused or withdrawn.

We would welcome further discussion with your authority before considering our position in regard to our power of direction for the Listed Building Consent.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
London & South East Region

Email: lpaburystreet@cityoflondon.gov.uk

17 May 2024

Dear Anna Tastsoglou,

SITE: Holland House 1-4, 32 Bury Street, City of London EC3A 5AW

REF: 24/00011/LBC & 24/00021/FULEIA

The Twentieth Century Society has been consulted on the above applications for alterations and extension to Holland House and the redevelopment of the Bury House site. These applications were reviewed by the Society's advisory Casework Committee of experts on Monday 13th May and the comments below reflect the committee's response. The Society strongly objects to the proposals on account of the harm that would be caused to the significance of the Grade II* listed Holland House and Creechurch Conservation Area.

Holland House was completed in 1916 to designs by the Dutch architect Hendrik Petrus Berlage for WH Müller & Co, a shipping, steel and mining company. The clients were the company heads, the German couple Anton Kröller and Helene Müller who had employed Berlage on projects in the Netherlands where their company was based and became important patrons of his work. Berlage was a major architect in the Netherlands and Holland House was a rare commission in England. WH Müller's London offices were built from steel to showcase the company's trade and impress in its modernity. Berlage had travelled to the US in 1911 and experienced its steel high-rises which he published in Amerikaansche reisherinneringen ('Memories of my American trip') in 1913. The Holland House offices was an early innovator in England for its adoption of a steel frame in construction. It is clad in hand-made glazed terracotta manufactured by the Royal Dutch Delftware Factory in Delft and imported to London on Müller's ships during WWI. The elevations have a strong vertical emphasis created through closely spaced full-height mullions set on a regular grid and chamfered to emphasise their slenderness. Ceramic spandrels, each with a central square boss, mark the floor levels. Black granite clads the building's plinth and entrances, and forms a relief carving of a steamship by Joseph Mendes da Costa at the corner of the return elevation to Bury Street. Key interior spaces were richly finished.

Policy

Holland House is Grade II* listed, placing it in the top 8% of listed buildings in England. Its conservation is therefore of the utmost importance. The local authority should be mindful of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which state that, in the decision-making process on applications affecting listed buildings, "the local

planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

The site is also located within the very recently designated Creechurch Conservation Area. The local authority therefore needs to bear in mind section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires that "In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

The application needs to be assessed in relation to paragraph 205 of the NPPF which requires that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation..."

In addition, paragraph 206 of the NPPF requires 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. Substantial harm to or loss of [...] assets of the highest significance [...] grade I and II* listed buildings [...] should be wholly exceptional".

Paragraph 207 states that: "Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use."

Assessment

It is the view of the Society's Casework Committee that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The 3 additional storeys would add considerable heaviness and bulkiness to the building's roofline. This extension would change the building's proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant's HTVIA views 42, 43 and 60. The proposed extension would also have a harmful impact on the building's fabric and on the character of its interior spaces, namely through the infilling of its lightwell.

The Society also has serious concerns about the proposed ground plus 43-storey office tower development to Bury House and its impact on the significance of Holland House. The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the proposed development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and

we are concerned that even more fabric would be removed as part of the current application. We are also concerned about the proposed insertion of a large stair to connect the ground and first floor levels and its impact on the interiors here. We have concerns about the cumulative impact of previous and proposed changes on the significance of this Grade II* listed building. The proposed ground plus 43-storey office would also clearly impact on the setting of Holland House – it would rise up directly behind the building and would appear to overshadow it. This is illustrated in the applicant's illustrative CGIs and views within its HTVIA. We accept that the proposed height of the office has been reduced from the previous application (which proposed a ground plus 48 storey tower) but a reduction of five storeys has done little to reduce its impact on the surrounding built environment. It was on account of this impact on heritage that the previous scheme was refused. The planning/heritage context has also changed since the previous application. This area has very recently been designated the Creechurch Conservation Area which makes the site even more sensitive to change and even harder to justify such tall development here.

These aspects of the scheme would majorly harm the significance of Holland House. We do not feel that this harm is mitigated by the few positive interventions proposed as part of the scheme, which includes restoring the elevations, replacing non-original windows with units closer to the originals, reinstating the blocked-in Bury Street entrance and conserving original interior finishes. These benefits could be delivered through a scheme which has a much less harmful impact on the site's heritage. We would seriously challenge the applicant's claim that remedial work to the elevations (which has already been approved by the local authority) could only be delivered through the wider redevelopment of the site (we refer to paragraph 2.32 of the planning statement).

For the reasons outlined in this letter, the Society strongly objects to the proposals and recommends that the local authority refuses these damaging applications. We do not object to adapting Holland House for office use nor to the redevelopment of the Bury House site in principle but take issue with the approach proposed and would like to see a more conservation-led scheme come forward.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on this application.

Yours sincerely,

[redacted]

Coco Whittaker

Head of Casework

The Twentieth Century Society
70 Cowcross Street

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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 the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021, 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.

Guy Newton
Conservation Adviser
Direct line [redacted]

THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

lpaburystreet@cityoflondon.gov.uk

Your reference: 24/00011/LBC &
Our reference: 193172

17 May 2024

Dear Anna Tastsoglou,

RE: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Thank you for consulting the Victorian Society about this application. We **strongly object** to the proposed scheme.

Significance and Harm

Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage. It is considered a key transitional building between the Art Nouveau and Art Deco styles, noted for its faience cladding, its sculpted corner resembling the bow of a ship, and its elaborately tiled entrance lobby. The heritage asset also forms a key building within the newly established Creechurch Conservation Area.

Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building positively contributes to the immediate setting of Holland House and the Creechurch Conservation Area.

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The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the complete removal of the top floor of Holland House, causing less than substantial harm.

To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building's fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset.

Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset.

The construction of a 43-storey building at 31 Bury Street would negatively impact the surroundings in which these heritage assets are experienced. The scale of the proposal would have the effect of overpowering the assets by absorbing them into the wider proposal, affecting the ability to appreciate the individual significance of both Holland House and Renown House.

Creechurch Conservation Area

The proposed scale and design of the development would have a far-reaching effect on the appearance and special architectural and historic character of the Creechurch Conservation Area, defined by intricate lanes and medium-rise buildings. This proposal would compromise this character by introducing an inappropriate scale and materiality, affecting the predominant setting of a number of designated and undesignated heritage assets, causing less than substantial harm to this conservation area, and damaging one of the key aspects of its significance.

Policy

National Planning Policy Framework (NPPF):

> Para. 205 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
>
> Para 206' Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
>
> b) assets of the highest significance…grade I and II* listed buildings…should be wholly exceptional'

The NPPF outlines the test for justifying harm to grade II* listed buildings as wholly exceptional. This application woefully fails to provide a clear or adequate justification that the scale and bulk of the proposed development, and that the subsequent substantial harm to a grade II* listed building, are absolutely necessary to unlock public benefits or to demonstrate that these benefits are indeed substantial, let alone wholly exceptional.

City of London's Adopted Local Plan (2015):

The Core Strategic Policy CS10: Design requires "that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces" and CS14: Tall buildings "Refusing planning permission for tall buildings within inappropriate areas, comprising of conservation areas" The proposed site sits within the Creechurch conservation area characterised by a mixture of low-rise and medium-height buildings. The approval of this scheme would directly contradict the extant local plan by introducing a building of bulk, scale, massing and height inappropriate for this area. We ask whether the City of London can confirm whether it intends to abide by policies set out in its extant local plan?

NPPF 212 states "Local planning authorities should look for opportunities for new development within Conservation Areas… and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

It is difficult to see how this proposal could possibly enhance or 'better reveal' the significance of this conservation area.

1990 Planning (Listed Buildings and Conservation Areas) Act:

> Section 16(2): Decision-makers must give 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest.'
>
> Section 72(1): 'Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.'

The application simply fails to adequately preserve a building of special architectural and historic interest due to the loss of historic fabric, disruptive additions, and the compromise of its immediate setting, in addition to the wider negative impact on a 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

ICOMOS Technical Review

Property	**Tower of London**
State Party	**United Kingdom of Great Britain and Northern Ireland**
Property ID	**488**
Date of inscription	**1988**
Criteria	**(ii)(iv)**
Project	**Bury House development**

On 9 February 2021, ICOMOS received information from the State Party, via the World Heritage Centre, regarding a development proposal at 31 Bury Street. There are 392 documents associated with this planning application.

The project proposal is as follows: Demolition of Bury House, 31 Bury Street, London and construction of a newbuilding comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

This Technical Review assesses the impact of the proposed development on the Outstanding Universal Value (OUV) of the Tower of London World Heritage property. The proposed development is located approximately 550 m northwest of the property. The proposed development at Bury Street is adjacent to London's 'Eastern Cluster'[1] of high-rise developments.

Summary of this Technical Review

The proposed development in its current form would result in harm to the authenticity and integrity of the Outstanding Universal Value (OUV) of the Tower of London World Heritage property. Neither is it wholly exceptional, nor is the harm justified or redressed by the public benefits to the proposal. The cumulative effect of existing buildings planning proposals that are pending and proposals that have received consent but are not yet built is already severe, and the proposed development would cause harm to the setting of the Tower of London World Heritage property, contrary to the Visual Management Guidance in the LVMF. The development proposal is not in accord with the Management Plan 2015. Separation of the White Tower retaining the clear view of the sky in its backdrop has not been successfully achieved. The Environmental Assessment accepts that the judgment in relation to the attributes of the Tower of London is a finely balanced one, but the Tower must remain the dominant building, separated from the City and respected by new developments.

The Advisory Body provides its detailed comments on the project below.

Background information relating to the property

Joint World Heritage Centre / ICOMOS Reactive Monitoring missions took place in 2006 and 2011, to address concerns in relation to the Tower of London World Heritage property. Technical Reviews carried out by ICOMOS in March 2019 and July 2020 further highlighted threats to the property. The

[1]Covered by the London Central Activities Zone (CAZ), this area is home to 30 St Mary Axe (the Gherkin, located approx. 50 m west of the site), the Leadenhall Building (the Cheesegrater, located approx. 170 m west of the site) and 52-54 Lime Street (the Scalpel, located approx. 10 m southwest of the site), plus emerging schemes such as 1 Undershaft, located approx. 125 m west of the site) and 100 Leadenhall Street. The area is responsible for close to 10% of the economic output of the UK.

retrospective Statement of Outstanding Universal Value (SOUV) for this property, adopted by the World Heritage Committee in 2013, notes in its section on management issues that there are threats and challenges to the property because of the urban development pressure in its close vicinity, and the potential negative impact of this process on integrity is indicated.

The 2006 Reactive Monitoring mission reviewed both approved and proposed development projects around the property, and in particular their possible impacts on significance, setting and views to and from the World Heritage property. It was accepted that the setting had been compromised since the 1960s due to the construction of several tall buildings around the City of London. These included the planning applications for the Minerva Tower (Houndsditch, 216 m) and the London Bridge Tower ("Shard of Glass", 303 m), due to a lack of adequate tools to assess visual impacts on qualities and values of cultural heritage, and thus (visual) damage to the setting.

The Mission noted that each new planning application is considered in isolation, notwithstanding the fact that several new developments taken together can have a magnified impact on the deterioration of cultural values. The 2006 Mission advised that finalisation of the Management Plan for the Tower of London and its environs was key and that Supplementary Planning Guidance should be provided to statutorily protect the remaining iconic views of the Tower, being from the south and south-west, both over the River Thames. The Mission also advised that the views to and from the property are critical for maintaining the property's integrity and for fully appreciating its setting. At that time, the Mission recommended that any tall buildings planned should not exceed the height by which they would become visible above the on-site historic buildings that are part of the Tower complex. The Mission was of the view that development of more tall buildings that would become visible would have a significantly negative visual impact on the integrity and seriously damage the Tower's OUV, possibly beyond repair.[2] Looking to future development, the Mission advocated the need for tight co-operation between the Borough Planning Authority, English Heritage and designers on planned development.

The second Reactive Monitoring mission took place in 2011 to review and discuss with national and local authorities the state of conservation of the property in its urban context, particularly its integrity in terms of visual impact; to review progress with the recommendations of the earlier mission; to assess how incremental changes as well as current and proposed major development projects in the immediate and wider setting of the property impact adversely or might impact adversely on its OUV; to discuss how in the absence of a buffer zone the immediate and wider setting of the property might be defined as a basis for evaluating the impact of proposed development on OUV and putting in place appropriate, specific protection; and to review the mechanisms and those under development for protecting the property and its setting.

The 2011 Mission reviewed the standards for World Heritage protection through the planning system and through the development of a system of management in Development Plans and Management Plans, and indicated that the "*Tower of London Local Setting Study*" constituted an important step towards the protection of the property's setting.[3] The management of the Tower of London and its setting is facilitated through that study. The Mission reiterated the advice to tightly regulate the construction of tall buildings in the vicinity of the property to maintain the property's integrity and to protect its OUV. It was noted that the incremental developments around the Tower over the past five years[4] had resulted in adverse visual impacts on its integrity. The World Heritage Committee requested the State Party "to evaluate the impact of proposed changes to the visual setting of the property on

[2] The Mission referred to a 38 storey high building under construction in the financial district, the 20 Fenchurch project, which it indicated would have a cumulative negative visual impact on the integrity of the Tower of London World Heritage property.
[3] prepared for the Tower World Heritage Site Consultative Committee in August 2010.
[4] Since the 2006 Reactive Monitoring mission.

its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency" (Decision 35 COM 7B.114).

The Technical Review carried out by ICOMOS in March 2019 responded to information received from the State Party via the World Heritage Centre concerning a high rise 'landmark' development project named "*The Tulip*" to be constructed within the setting of the World Heritage property. The ICOMOS Technical Review of July 2020 followed the reception of information from the State Party via the World Heritage Centre regarding the development of a tall office building of 262 m at 100-107 Leadenhall Street, London. For each of those proposed developments within the London City area, more precisely called the "*Eastern Cluster*", the conclusions of those Technical Reviews indicated that the proposed developments were not compatible with the preservation of the integrity of the Tower of London World Heritage property. Their findings expand concerns about the impact of development on setting.

Key attributes that express the OUV of the Property

The retrospective Statement of Outstanding Universal Value (SOUV) for the property was adopted in 2013 (Decision 37 COM 8E).

The SOUV notes that the Tower of London is an internationally famous iconic complex, "the most complete example of an 11th century fortress palace remaining in Europe", and "a rare survival of a continuously developing ensemble of royal buildings". It was strategically sited on the river Thames acting as "a symbol of Norman power". It further states that "The Tower's landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave are all key aspects of its significance". The Tower "helped shape the story of the Reformation in England" and the ensemble is "a major reference for medieval military architecture". The ensemble "has strong associations with State institutions" that "incorporated such fundamental roles as the nation's defence, its records and its coinage" and was "a major repository for official documents and precious goods owned by the Crown". In terms of integrity, it is noted that the strategic siting lends itself to "the Tower's historic physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such proposals could limit the ability to perceive the Tower as being slightly apart from the City, or may have an adverse impact on its skyline as viewed from the river". These aspects of significance "have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription".

Management Plan 2016

The current Management Plan for the Tower of London World Heritage property was published in 2016 by Historic Royal Palaces. It articulates that the greatest challenge to the property is the impact of development on its setting and tall buildings. In terms of authenticity, the form, design and materials of the property remain intact and legible but its strategic siting and historic relationship with the City of London is considered to be vulnerable to proposals for development that do not respect its context and setting.

Legal and Policy Framework

The State Party meets its obligations under the World Heritage Convention through the National Planning Policy Framework (NPPF), National Legislation and other Guidance.

Paragraph 189 of the NPPF (2021) states that: *"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally*

recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations." In accordance with the NPPF, it is the applicant who is required to describe the significance of any heritage assets affected including any contribution made by their setting. This in effect provides a basis for Heritage Impact Assessment (HIA) reports and decisions being taken on an informed basis.[5,6]

Paragraph 193 of the NPPF indicates 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance"*.

Paragraph 200 states that: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*". It suggests that substantial harm to or loss of "*assets of the highest significance, notably* […] *World Heritage Sites*, *should be wholly exceptional"*. And Paragraph 202 states that: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".*

The National Planning Practice Guidance **(**NPPG), 2019, provides detailed information on how the NPPF should be implemented in practice and on protection of World Heritage.[7] The NPPG includes detailed advice on protection of setting and refers to the Operational Guidelines for the Implementation of the World Heritage Convention in terms of the protection of important views or attributes that are functionally important as a support to the property. The ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011, is referenced.[8] The precautionary principle is confirmed as being appropriate and applies to World Heritage properties' attributes; so that levels of harmful change may be reviewed and justifications for it may be turned down.

The Greater London Authority (GLA) has the obligation to produce and keep under review a spatial development strategy which is known as the London Plan.[9] The current 'New London Plan' dates from 2021 (LonP 2021) and forms part of an integrated policy framework of protection for World Heritage

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[5] Paragraph 194*: "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".*

[6] Paragraph 195: *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal*".

[7] Paragraph 32 of the guidance on historic environment states: "*In line with the National Planning Policy Framework, plans, at all levels, should conserve the Outstanding Universal Value, integrity and authenticity* […] *of each World Heritage Site and its setting, including any buffer zone or equivalent.*" Requirements for policies to protect and enhance World Heritage properties should aim at "*protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development; striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone; protecting a World Heritage Site and its setting from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect*".

[8] The NPPG indicates that proposals that would result in harm to the authenticity and integrity of the OUV should be wholly exceptional; that less than substantial harm must be justified, and that proposals causing harm will be weighed against the substantial public benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to mitigate the extent of the harm.

[9] A strategic social, economic, transport and environmental framework for London's future development over 20-25 years.

in the city.[10] Policy HC2 within the plan, on 'World Heritage Sites'[11] indicates that "boroughs with World Heritage Sites, and those which are neighbours to authorities with World Heritage Sites" should work together to protect the OUV; and that the obligations concerning development proposals "in World Heritage Sites and their settings, including any buffer zones"[12] should not compromise the ability to appreciate their OUV or the authenticity of their attributes. The need to support development proposals by Heritage Impact Assessments; the need for up-to-date World Heritage Site Management Plans; and the need to give that Management Plan appropriate weight is emphasised.[13]

Policy HC3 of the LonP 2021 relates to strategic and local views and commits to identifying and protecting "aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and the attributes of Outstanding Universal Value. This includes the identification of protected silhouettes or key features in a World Heritage Site" and the setting of London's World Heritage Sites, considered to be "the surroundings in which they are experienced". It indicates that "the consideration of views is part of understanding potential impacts on setting".

The 'London View Management Framework, Supplementary Planning Guidance, 2012'[14] (LVMF SPG*),* indicates views where proposed development has potential to have an impact on this World Heritage property.[15] The purpose of that document is to explain in detail a policy approach so that boroughs, applicants and other statutory authorities can assess a proposal's compliance with the LonP 2021.[16] The LVMF SPG document provides a robust basis for the protection of identified views, vistas and silhouettes.[17] It also requires that development that might affect views identified by other statutory authorities should, where relevant, be assessed to determine its potential effect on those views.[18] It stipulates that these should be set out in the World Heritage Site Management Plan and should be

[10] It contains policies to protect and enhance the historic environment in general and World Heritage properties in particular.

[11] "*Boroughs with World Heritage Sites, and those which are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World heritage sites, which includes the authenticity and integrity of their attributes and their management*."

[12] "*Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection."*

[13] The LonP 2021 indicates that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments" as well as the need for "up-to-date World Heritage Site Management Plans"; and that "when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan".

[14] The LVMF SPG as adopted, prepared for the Greater London Authority, remains operative in the implementation of the LonP 2021.

[15] There are three types of Strategic Views designated in the New London Plan 2021: "L*ondon Panoramas, River Prospects, and Townscape Views (including Linear Views). Each view can be considered in three parts; the foreground, middle ground and background*". 'Protected Vistas' towards Strategically-Important Landmarks are composed of two parts: a Landmark Viewing Corridor and a Wider Setting Consultation Area. The Mayor, through the LVMF SPG, has indicated that he "*will seek to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark it should be resisted*".

[16] In the LVMF SPG, in relation to all designated views, visual management guidance is given, landmarks are identified, and incremental change must contribute positively to the view or it will not be considered. Careful considerations should be made concerning tall buildings which will need to "*preserve or enhance the setting of key landmarks and to relate to and strengthen the composition of the emerging clusters of tall buildings*". The importance of not altering the protected silhouette is strongly flagged.

[17] While many views have been addressed in the LVMF SPG, it is important to realise that once the attributes (in the context of the Management Plan) have been considered, it is likely that additional views within and looking towards or from the World Heritage property may need to be considered. The LVMF SPG does not seek to give guidance on every aspect of visual impact assessment.

[18] The LVMF SPG gives further technical information in an appendix covering the selection of appropriate field of view for each "Accurate Visual Representation" (AVR) and it recommends a procedure to be followed to indicate the location of a proposed development as accurately as possible; "*it may also indicate the degree to which a development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure so that it can be relied on by assessors to represent fairly the visual properties of a proposed development*".

supported by using accurate 3D modelling and other best practice techniques. Critically, the LVMF SPG states that local Planning Authorities should incorporate the principles of the LonP 2021 and the LVMF SPG into development plans and should monitor any potential changes to the designated views and their effect on the quality of the view. It goes on to highlight that development plan documents must support the setting of the World Heritage property. An assessment process is described for planning applications with proposals that could affect designated views.[19]

Two views identified in the LVMF SPG are relevant to this Technical Review: View No. 10 – 'River prospect Tower Bridge', and View No 25A.1-3 - Townscape View - 'The Queen's Walk to Tower of London'. View No. 10 has a viewing location from the North Bastion on Tower Bridge upstream. From the assessment point 10A.1, there is a deep and wide panorama where, as described in the LVMF SPG, "*The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued."* The Visual Management Guidance in the LVMF SPG states that *"The Tower of London should not be dominated by new development close to it."*[20] It states in relation to the background that "*Development proposals likely to affect the World Heritage Site should pay regard to the guidance set out in the Tower of London World Heritage Site Management Plan published by Historic Royal Palaces (HRP)* […] *It is recommended that HRP and English Heritage[21] are consulted on all relevant proposals at an early stage."*[22]

Paragraph 407 of the LVMF SPG relates to the view from the Queen's Walk to the Tower of London from the South Bank with a viewing location, No. 25A, close to the river. Paragraph 409 of the LVMF SPG indicates that three Assessment Points (numbered 25A.1, 25A.2 and 25A.3) are placed in this location. They provide good views of the Tower of London, and "*the relatively clear background setting of the White Tower, in particular"*. A Protected Vista is included from Assessment Point number 25A.1 and "*a Protected Silhouette is applied to the White Tower*" between Assessment Points numbers 25A.2 and 25A.3.

Paragraph 411 of the LVMF SPG indicates that "*The Tower of London was built to dominate the City, and to control the river at its entrance. The City has now grown to encompass the World Heritage Site, the latter retaining only its essential historical relationship with the river and a clear backdrop silhouette to the White Tower from the south-west.*"

Paragraph 412 of the LVMF SPG states that "*This view* [from assessment point No. 25A.1] *provides the greatest understanding of the World Heritage Site ensemble where there are clear views of the southern and western faces of the White Tower down to the roof of the Waterloo Block. The clear view of the sky in the backdrop of the White Tower is an important attribute."*

In terms of visual management guidance, paragraph 415 of the LVMF SPG sets out that "*New development should respect the setting of the Tower of London and should not dominate the World Heritage Site – especially the White Tower. Consideration should be given to advice set out in the Tower of London World Heritage Site Management Plan, published by Historic Royal Palaces (HRP)."*

'London's World Heritage Sites – Guidance on Settings, Supplementary Planning Guidance, 2012,' (LonWHS SPG) provides information on World Heritage properties and their settings; information on the elements that contribute to a property's OUV, so as to ensure these are conserved and enhanced

[19] It should be accompanied by "*an analysis that explains, evaluates and justifies any visual impact on the view. The analysis will demonstrate that the proposal is consistent with the relevant London Plan policies, including 7.10 World Heritage Sites, 7.11 London View Management Framework and 7.12 Implementing London View Management Framework*".
[20] LVMF SPG, Paragraph 183, p. 100.
[21] Now Historic England.
[22] LVMF SPG, Paragraph 184, p. 100.

by developers, policy makers and other stakeholders; and guidance for assessing the effect of potential development on London's World Heritage properties and their settings.[23] The LonWHS SPG does not address the specific setting for each individual World Heritage property, but states that this is more appropriately done through the Steering Groups and Supplementary Committees established for each property.[24] The LonWHS SPG goes on to address Local Development Framework (LDF) preparation where it indicates that LDFs should contain policies to protect, promote, interpret and conserve the historic significance of World Heritage properties and their OUV, integrity and authenticity. They should safeguard, and where appropriate, enhance them and their settings. The LonWHS SPG indicates that, where available, World Heritage Site Management Plans should be used to inform the plan-making process.

Locally, the Tower of London falls within the London Borough of Tower Hamlets and is adjoined by the City of London and the London Borough of Southwark. Each of these local planning authorities has a Local Development Plan, which provides a framework of policies to protect and promote the Tower of London World Heritage property.

Documentation from the Applicant

A Townscape, Built Heritage and Visual Impact Assessment ('TBHVIA') was prepared as part of the planning application submitted to the City of London in October 2020, which formed Volume 2 of the Environmental Statement. This considers the impact of the proposed development upon all heritage receptors which are given a value. In addition to the TBHVIA, at the request of the City of London, a separate and freestanding Heritage Impact Assessment (HIA) was prepared outlining the effect of the proposed development on the OUV of the Tower of London World Heritage property. The HIA considers the impact of the proposed development on important views and concludes that the proposed development does not harm the OUV of the World Heritage property. The HIA also notes that "some commentators may form a different judgement and find that the Proposed Development causes harm to the Outstanding Universal Value" of the property. A Design and Access Statement was also prepared.

A matrix has been used by the Applicant to review the magnitude of effects based on the value of the heritage receptors. The TBHVIA acknowledges that professional judgment is required to determine significant likely effects. When cumulative effects are being considered, the TBHVIA states that the 2011 ICOMOS Guidance does not have a specific section on cumulative effects. However, it states that those effects have been considered. The approach taken by the Applicant has been to focus on additional effects of the development over and above the cumulative baseline. This is an acknowledgment that cumulative effects may be complex in an urban environment. The assessment refers to the 'Tower of London Setting Study, 2010', which concluded that the Tower must remain the dominant building, separated from the City and respected by new developments.

The TBHVIA accepts that the judgment in relation to the Tower of London is a finely balanced one, which considers the separating distance between the World Heritage property and the proposed development, the skyline composition, and the slender appearance of the tallest element. It suggests there is no impact on the silhouette of the Tower of London World Heritage property in strategic views. It states that the proposed pantone blue colour palate will soften the appearance of the building against the skyline and the matt materials will reduce potential glare. It goes on to state that "*if this*

[23] Setting is described in that document as "*the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*."

[24] The intention of the LonWHS SPG is to "*ensure a more consistent interpretation of settings and an understanding of their importance in contributing to an appreciation of OUV to help support consistency in decision making to conserve the World Heritage Sites' Outstanding Universal Value, integrity, authenticity and significance*".

judgment is formed then we consider that the harm identified must be 'less than substantial' in the terms of paragraph 196 of the National Planning Policy Framework and, on a sliding scale, at the very bottom of that spectrum. We would invite the decision maker to consider the level of harm against the significant package of public benefits generated by the Proposed Development".

The Applicant indicates that the proposed development would be visible in River Prospect views identified in the LVMF SPG, including view 10A.1, which looks from the north bastion viewing area of Tower Bridge towards the Tower of London. The proposed development would also be visible in Townscape view 25A.1-3 identified in the LVMF SPG (Queen's Walk to Tower of London), which looks to the Tower of London from the south of the river. The Design and Access Statement suggests that the proposed development has been sensitive to these views. The HIA, concerning view 10A.1, states that the "*Proposed Development would have a Negligible magnitude of Impact on the setting of the WHS in this view. This would give rise to a Slight Adverse effect*". In the cumulative view, the finding is the same. It concludes that the proposed development does not harm the significance of the Tower of London World Heritage property.

The Eastern Cluster Zone contains a high density of businesses and jobs and, in the future, this area will contain even more tall and large buildings.[25] A key vision for this area according to the draft City Plan includes increasing the provision of world class buildings, delivering tall buildings that make a positive contribution to the City's skyline, enhancing the public realm to improve pedestrian connectivity, and providing a range of complimentary land uses ensuring active frontages at ground level. The application describes the potential benefits of the development.[26] The Design and Access Statement refers to the surrounding context and suggests that the proposal provides an elegant form in the setting of the Eastern Cluster from strategic views.

On the issue of height, the Design and Access Statement suggests that the team has worked to design a building of appropriate height in its context as part of the eastern cluster but with awareness or sensitivity towards important heritage assets including the World Heritage property. The massing analysis in the Design and Access Statement suggests that the scale and form of the proposed development has been informed first[27] by consideration of the setting of the Tower of London, World Heritage property, particularly as described in the Management Plan (2016), and as seen in River Prospect 10A.1 and Townscape View 25A.1-3 of the LVMF SPG (2012); second, by the shape of the existing and emerging Eastern Cluster in the City of London; and third, the appearance and proportion of the proposed building as a piece of architecture in its own right. It goes on to indicate that the starting point for the proposed massing is driven by three key factors which include maintaining visual separation from the Tower of London silhouette between London Tower and One Bishopsgate Plaza; the shoulder line datum; and the exploration zone of the potential increased height. It is also suggested in the Design and Access Statement that the design takes into account maintenance of visual separation from the Tower of London silhouette by keeping the primary massing of the form to shoulder height and keeping the structure above the shoulder line as a slender element in order to respect the visible sky component around the silhouette.

[25] According to the City of London Local Plan, the majority of new office space will be built in the Eastern Cluster Zone accounting for 50-60% of all projected City office space. Furthermore, within the draft City Plan 2036, the site lies within 'The City Cluster Key Area of Change'.

[26] to include publicly accessible internal amenity space and community space; a new covered pedestrian route reintroducing an historic route in the city and enhancing permeability; a new pocket park; prioritisation of pedestrian and cycle accessibility; provision of small and flexible retail space; activated spaces at street level; creation of high quality office space; provision of flexible affordable workspace to meet local demand; introduction of a high quality tall building as part of the "Eastern City Cluster"; acting as a positive catalyst for investment in London; building on the accessible location to integrate with public transport; delivering a sustainable development; incorporation of innovative technologies reducing carbon emissions; a fossil fuel free building; extensive greening; and new and improved public realm.

[27] Design Access Statement, Part 1, p. 66.

Documents submitted by Consultees and others

Historic Royal Palaces' (HRP) submission as guardians of the Tower of London World Heritage Property asserts that the proposed development would have a damaging visual effect on aspects of the Outstanding Universal Value of the World Heritage property.[28] Their response indicates that while they recognise that the design approach of the applicant sought to cut back at a high level the upper part of the proposed tower in order to maintain some visual separation from the White Tower silhouette protected in the LVMF SPG, view number 10A.1, this approach will allow only a sliver of sky space separating the proposed structure from the Tower of London, and notes that the proposal will not really achieve the desired strength of the silhouette. Also, HRP notes that this view is not static and suggests that with movement the proposed spire loses even that tiny degree of separation.

The submission of HRP acknowledges that the designer has tried to address the concerns about the Tower's dominance, but states that the effect of the proposal would be to compromise the free space around the White Tower. In pre-application discussions, HRP had suggested that "*a different approach might see a lower, broader building that is not so intrusive in the local views and would not extend the eastern shoulder so definitively, providing that it would not rise above the turrets of the White Tower in LVMF view 10A.1*". HRP also cites further damaging visual effects in the dynamic journey across Tower Bridge and in local views identified in the Local Setting Study 2010. Historic Royal Palaces' submission on the applicant's proposal concluded that it would cause harm to the OUV of the Tower of London.

Historic England's submission on the Applicants development proposal indicates that it would cause harm to the OUV of the World Heritage property principally because of "*the visual impact presented by the proposed development in the view from the North Bastion of Tower Bridge (LVMF View 10A.1) which would reduce the ability to appreciate the Tower of London's strategic and dominant position along the river, set apart from the mercantile city*." Historic England asserts that they "*have not seen clear and convincing justification for this harm or evidence that this harm would be outweighed by public benefits*." Thus Historic England's submission recommends *"that a significant reduction in height is explored so the proposals would no longer affect the setting of the World Heritage Site from this viewpoint, avoiding the harm identified.*"

The submission of Historic England considers the tension between the juxta-positioning of the Tower in relation to the river and the city as fortress and gateway and its wider setting including long views, which "*will continue to be threatened by proposals for new development that is inappropriate to the context.*" It is their view that "*such development could limit the ability to perceive the tower as being slightly apart from the City, or have an adverse impact on its skyline.*"

According to Historic England, the proposal would be particularly noticeable in LVMF view 10A.1. It would diminish the visual dominance of the Tower, one of three Strategically-Important Landmarks for London, exceeding the height of its corner turrets. It would erode the appreciation of the Tower of London's strategic siting on the river set apart from the mercantile city by blocking part of the skyline between the eastern cluster and the White Tower. This would harm an attribute of the OUV.

[28] The LVMF SPG for view 10A.1 states that "*The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the white tower. Where it has been compromised its visual dominance has been devalued*." Regarding the background to the Tower, the LVMF SPG notes state "*views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site*."

Historic England also states that it considers the impact on the cross river views (LVMF views 25A.2-3) from the Queen's Walk at City Hall to be relatively minor in this view. Historic England indicates, however, that the proposed development would also be visible within the Tower of London Inner Ward, and particularly noticeable in the view towards the Grade 1 Listed Chapel Royal of St Peter ad Vincula and would be an intrusion into the self-contained ensemble of historic buildings.

The submission concludes that in relation to tall buildings, policy requires that buildings in the setting of a World Heritage property must preserve and not harm the OUV of the property nor the ability to appreciate it. Historic England is of the view that the proposed development in its current form would harm the integrity of the World Heritage property and that the public benefits of the proposal do not outweigh the harm. In conclusion, Historic England states that the proposed development would give rise to substantial harm to the significance of the World Heritage property and is not in accord with the Management Plan.

ICOMOS' Observations and Conclusions

ICOMOS considers that the most significant challenges lie in managing the environs of the Tower of London World Heritage property so as to protect its OUV and setting. At a strategic level, these challenges are generally recognised and a series of documents form a framework of policies aimed at conserving, protecting and enhancing the OUV of the Tower and its setting. The challenges are also identified in the Management Plan, which defines the local setting of the Tower and key views within and from it.[29] The proposed development is not in accord with the Management Plan. It would harm the integrity of the Tower of London World Heritage property and it would harm the significance of the property.

From the framework of protection for World Heritage in London, it is recognised that proposals that would result in harm to the authenticity and integrity of the Outstanding Universal Value should be wholly exceptional; that less than substantial harm must be justified; and that any harm will be weighed against the substantial public benefits of the proposal. It must also be shown that all reasonable efforts have been made to mitigate the extent of the harm. The public benefits from the proposal would not justify the granting of planning permission when weighed against the harm that would be caused to the setting of the Tower of London World Heritage property. There are, in practice, numerous examples of proposals involving less than substantial harm to the OUV of a World Heritage property having been refused on the basis that the benefits do not justify the harm to a World Heritage property, as a heritage asset of the highest significance.

The application describes the potential benefits of the development and asserts that the development would cause "*Negligible magnitude of impact on the setting of the WHS* […] *This would give rise to a Slight Adverse effect*". The arguments put forward on behalf of the Applicant admit that there will be some change to the setting of the World Heritage property. However, they appear to consider the proposed development as a way of improving the setting and to weigh this potential impact more highly as a positive contribution. This approach is not balanced in terms of the consideration that is given to the proposed development's potential negative impact on the OUV of the Tower of London World Heritage property and its supporting attributes. The NPPF highlights "*the surroundings in which a heritage asset is experienced"* and indicate that *"its extent is not fixed and may change as the asset and its surroundings evolve*."

[29] The Management Plan states that "Objectives in the Management Plan to address the challenges are being implemented (for example, through a local setting study that informed understanding of the immediate setting of the property, and through work on the property's attributes), although pressures remain significant, particularly in the wider setting".

The Applicant suggests that there is no clarity in submissions received from consultees about which attributes are harmed by the proposal. Regarding the interaction of the property with the Eastern Cluster, it suggests that "*the management guidance in LVMF 10A.1 does not identify the White Tower's silhouette as a geometrically protected threshold; it is simply a point of sensitivity to test and assess*". Finally, it states that the proposed development will "make it clearly part of the composition of the Eastern Cluster" whilst helping "*to mediate between the very tall recently consented" schemes and the Tower*". It relies on an interpretation of View 10A as being static and geometrically defined. This interpretation is not correct, and the LVMF SPG and associated guidance was never intended to exclude further important ways of appreciating the attributes which support OUV from being referenced. The LVMF SPG, written over a decade ago, is a tool, but the views experienced are not finite and they do not exclude other ways of experiencing the OUV from being protected. The proposed development will narrow the gap between the Eastern Cluster and the Tower and will reduce the separation of the Tower from the City. It has been acknowledged in the Management Plan and elsewhere that the OUV of the Tower of London World Heritage property has been compromised, but it cannot be argued that other structures impacting on OUV mean that the impact of a new proposal impacting negatively is to be tolerated.

Both Historic England and Historic Royal Palaces in pre-application discussions advocated for caution in relation to the potential impact of development on the attributes of the World Heritage property. This advice was not adopted. Similarly, neither the pragmatic proposal of Historic England for height reduction, nor that of HRP for a wider lower building, were taken up. While it is clear that attempts have been made on behalf of the Applicant to consider the visual separation of the White Tower, in terms of adjustment of the massing, form and materials, this Technical Review does not find that separation of the White Tower has been successfully achieved. The "*clear backdrop silhouette to the Tower from the south-west*" will be breached by the proposed development and there will be an impact on "*the clear view of the sky in the backdrop to White Tower* [which] *is an important attribute*". When that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. It is considered that the harm to the setting of the Tower of London World Heritage property should be given very considerable weight against the proposal.

The degree of separation of the Eastern Cluster to the Tower is compromised as the proposed development would mark a further extension of the city eastwards, reducing the visual separation between the City and the Tower of London World Heritage property. The prominence of the proposed development would draw increased attention towards the City cluster. This would distract from the prominence of the Tower and would affect the sense of intended enclosure at the concentric defences which culminate in the White Tower. It would also impact negatively on the property's attributes, namely the physical prominence of the White Tower, its strategic and landmark setting, and its iconic monumental status.

The cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe, and the proposed development would cause harm to the setting of the Tower of London World Heritage property, contrary to the Visual Management Guidance in the LVMF. ICOMOS in its March 2019 Technical Review of an earlier application for a tall structure at land adjacent to Bury Street[30] stated that *"the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable*

[30] City of London ref: 18/01213/FULEIA

approach to allow further negative visual impact on the property's integrity when it is already threatened." This argument is maintained.

ICOMOS advises that the State Party consider:

- utilising the findings of the earlier Reactive Monitoring missions and the ICOMOS Technical Reviews of March 2019 and July 2020 concerning proposed development in the setting of the World Heritage property;
- appreciating that where change occurs to setting it needs to be considered in a manner that relates it more directly to the supporting attributes of the property;
- reviewing the proposed project and recommending adjustments such as height reduction that would ensure it does not impact on the Outstanding Universal Value or on any of its supporting attributes, all of which are equally important;
- availing of additional more recent technologies and tools to understand three dimensionally and kinetically the potential impact of proposed changes on the Outstanding Universal Value of the property and its setting and the attributes which support it.

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

ICOMOS, Charenton le Pont
July 2022.

Application ref: 2024/1064/P
Contact: Jennifer Walsh
Tel: [redacted]
Email: [redacted]
Date: 25 June 2024

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Regeneration and Planning
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City of London
Guildhall
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EC2P 2EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
1-4
31-34 Bury Street
London
EC3A 5AR (for 24/00021/FULEIA) and
Holland House
1 - 4
32 Bury Street
London
EC3A 5AW (for 24/00011/LBC)

Proposals:

24/00021/FULEIA: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell,

reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Drawing Nos: City of London Cover Letter Dated 14th March 2024.

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

Informative(s):

1 Reason for raising no objection:

The proposal includes the demolition subsequent redevelopment of the whole site as outlined in the description of development. The application for planning permission is an EIA application.

The application site is a significant distance from the London Borough of Camden boundary. The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions. The London Borough of Camden therefore raises no objections to the application.

Yours faithfully



Daniel Pope
Chief Planning Officer

APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00021/FULEIA

Development Management Case Officer: Anna Tastsoglou

Site Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Application Received: 8th January 2024

Request for Comment Received: 14th March 2024, updated CCRSS received on 22nd August 2024

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Climate Change Resilience Sustainability Statement (Hoare Lea, August 2024)
- Sustainability Statement (Hoare Lea, October 23)
- Design and Access Statement (Stiff+Trevillion, January 2024)
- Flood Risk Assessment and Drainage Strategy (Thorton Tomasetti, January 2024)
- Outdoor Thermal Comfort Assessment (GIA Chartered Surveyors, October 2023)
- Preliminary Ecological Appraisal and Biodiversity Net Gain Report (Hilson Moran, September 2023)
- Health Impact Assessment (Quod, January 2024)

Overheating and the urban heat island effect

Section 8.3 within the CCRSS covers the risk of heat stress and assesses the following hazards:

- Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk)
- Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk)
- Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk)

Date & Initials

- High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk)
- Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk)
- Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk)
- Increased risk of damage to building materials (Moderate Risk)

To manage the above risks, the CCRSS states that the following design features and techniques will be included:

- Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources
- Facade and building services have been designed with a fan coil cooling solution
- Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling
- An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:
    - All ground level conditions were suitable for intended use, or no worse than the baseline conditions.
    - The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe.
    - Conditions for all existing off-site terraces are suitable for the intended use.
    - Conditions for all proposed terraces are suitable for the intended use
- Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present
- Building maintenance strategy will be implemented to check and treat materials for UV damage
- Materials on exposed areas will be designed and installed to weather effectively
- Structural foundations and frame have been designed to accommodate a range of soil stiffness values

All heat stress hazards residual risks have been assessed as Low.

Flooding

Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards:

- Rising sea levels could increase the risk of flooding to the building and the surrounding area (High risk)

- Increased duration of prolonged rainfall could cause an increased risk of surface water flooding (Very High risk)
- Increased risk of flooding causing significant damage to the development and requirements for weather proofing (Moderate risk)

The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low.

Water stress

Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards:

- Increased risk of drought (Moderate risk)
- Increased duration of prolonged rainfall could cause impacts on structural stability within the building (Moderate risk)
- Risk of material degradation due to extended exposure of building materials to increased moisture levels (Moderate/ low risk)
- Increased risk of extended duration of water stress and high water costs (Moderate risk)

In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks:

- Project will prioritise native, locally sourced plants for the public realm landscape strategy
- Landscape strategy supported by ecologists and landscape architect's recommendations such as appropriate species which are resilient to periods of water scarcity
- Roof drainage will be used for irrigation of green walls and roofing
- SuDS in the form of blue roofs and tanks will attenuate rainfall
- Site is not at risk from groundwater flooding
- Lowest level basement slab will be designed for Grade 3 waterproofing which will protect against future risk
- Internal linings proposed in retained basements
- Efficient water fittings installed to reduce water consumption

All water stress hazards' residual risks have been assessed as Low.

The FRA & DS states that "*roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants.*"

Biodiversity and pests and diseases

APPLICATION COMMENT FORM

Section 8.4 of the CCRSS assesses the risk to natural capital and includes the following hazard:

- Risk of loss of biodiversity and high quality green space (Moderate Risk)

The CCRSS states this risk will be managed through:

- Introducing increased vegetation on site, in green roofing, terrace planting and public realm planting
- Habitat infrastructure such as bird and insect boxes to be installed
- Project will prioritise native, locally sourced plants for the landscape strategy

The CCRSS classes the residual risk as Low.

Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards:

- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to humans (Moderate Risk)
- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to plants (Moderate Risk)

The CCRSS states this risk will be managed through:

- Implementation of a pest management plan or implementation of an accredited Pest Management program
- Regular monitoring and maintenance of ventilation systems
- Consideration of new warm-climate pests will be factored into final species selection for planting

The CCRSS assesses the residual risk to be Moderate /Low.

A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through:

- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment;
- Provision of flexible community/education/cultural space meeting an identified need in the area;
- 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;

APPLICATION COMMENT FORM	
• A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above); • Provision of new open space at James' Court and external building terraces providing much needed amenity provision; • Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment; • Inclusivity and accessibility as placemaking principles; • Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity; • The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards • BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures Food, trade and infrastructure The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure. Recommendation: The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.	EB 30/08/24

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 7 October 2024
Our Ref DS/SUDS24/00056
Your Ref PT_AT/24/00021/FULEIA
Subject Bury House 1-4 31-34 Bury Street London EC3A 5AR

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed submitted information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

From: [redacted]
To:
Subject: RE: Consultation in relation to Accessible Dwellings (24/00021/FULEIA)
Date: 08 October 2024 12:24:52

Anna,

The legislation is such that Planning policy sets the number of each type of accessible dwelling and Building Regulations enforces the standard.

In this regard, I do not believe you need to do more than set the requirement.

If you do wish advice on accessibility matters I would suggest you contact Harriet as this is her role.

Mark

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, October 8, 2024 11:34 AM
To: District.Surveyor <[redacted]>
Subject: Consultation in relation to Accessible Dwellings (24/00021/FULEIA)

Dear Sir/Madam

Please see attached request for advice in relation to accessible dwellings for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

From:	London ePlanning
To:	PLN - Comments; Tastsoglou, Anna
Subject:	RE: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date:	08 October 2024 15:36:34

THIS IS AN EXTERNAL EMAIL

Dear Anna,

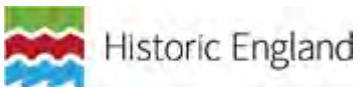
Thanks for re-consulting us.

Please refer to our objection letter dated 15 May 2024.

Best wishes,
Charlotte

Charlotte Cartwright (she/her)
Business Officer
Historic England | 4th floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Phone: 020 7973 3764

*Please note I do not work Fridays



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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:32
To: London ePlanning <e-london@historicengland.org.uk>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works affecting the setting of a Listed Building.

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou
Anna.Tastsoglou@cityoflondon.gov.uk
020 7332

Details
OUR REF: 24/00021/FULEIA
ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)
PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 09 October 2024
Our Ref 24
Your Ref 24/00021/FULEIA

Subject Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent :

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

The office terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. The public terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer

Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to construction in order that the impact on amenities is minimised from the time that the construction starts.

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used to demonstrate that noise levels from the proposed Rehearsal & event space/Sports facilities area shall not exceed the existing background level (lowest $L_{A90(15min)}$) at 1m from the nearest noise sensitive receptor. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the proposed café use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

Reason: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Regards

[redacted]

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: [redacted]

From: DD - Airport Safeguarding/BAA
To: PLNComments
Subject: Re: Planning Application Consultation: 24/00021/FULEIA
Date: 09 October 2024 11:01:10
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (aerops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:29
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 24/00021/FULEIA

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Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London
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THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for your e-mail.

Please can you clarify what the main changes are to the above planning application. I do not see any new relevant documents regarding Thames Water assets and Clean Water capacity.

If there are no new changes to the SQM figures for the site, we have no further comments to make and our previous response still stands.

Kind Regards,

Saira Irshad
Development Database Administrator
Tel: 0203 577 9956
devcon.team@thameswater.co.uk

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:30
To: Devcon Team <devcon.team@thameswater.co.uk>
Subject: Planning Application Consultation: 24/00821/FULEIA

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Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London
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From: Active Travel England Planning
To: Ipaburystreet
Subject: LPA Reference: 24/00021/FULEIA Standing Advice Response
Date: 09 October 2024 14:50:55

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00021/FULEIA

ATE Reference: ATE/24/00379/FULL

Site Address: BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw0000007FTlIAM;4ddaa967bcb592e9beefb3a8386623ab:ref]

From: [redacted]
To:
Cc:
Subject: FW: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date: 10 October 2024 14:00:35
Attachments: ufm42_English_Heritage_Consultation_Email.pdf
Bury House and Holland House rec cond_220218.docx
Bury House and Holland House rec cond_220218.pdf

THIS IS AN EXTERNAL EMAIL

Hi Anna
Thank you for reconsulting me. The additional information does not affect my original advice, which I have reattached for information
Regards
Helen

Helen Hawkins MCIFA

Archaeology Adviser, City of London

Greater London Archaeology Advisory Service (GLAAS)

[redacted]

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

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 08 October 2024 11:31
To: E-Glaas [redacted]>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou
[redacted]
020 7332

Details
OUR REF: 24/00021/FULEIA
ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)
PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

11 October 2024
Crossrail Ref: CRL-IP-3294

Dear Anna Tastsoglou,

24/00021/FULEIA : Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 08 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 14 October 2024
Our Ref DS/FS24/0048
Your Ref 24/00021/FULEIA
Subject Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

I have reviewed the submitted fire statement and have no comments.

I consider that policies D5 and D12 have been met.

LPA Ref: 24/00021/FULEIA

London City Airport Ref: 2024/LCY/230

Date: 15/10/2024

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

LPA Reference	24/00021/FULEIA
Proposal	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Location	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Borough	City of London
Case Officer	Anna Tastsoglou

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale
On behalf of London City Airport

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 16/10/24
Your Ref: 24/00021/FULEIA

Subject: Bury House, 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/cafe (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

The proposed development will be car free and heating/cooling will be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Secondary power is proposed to be supplied by a second mains connection, and it has been confirmed there is to be no backup generator installed.

Particulate filtration has been proposed as part of the full mechanical ventilation strategy. Due to the majority of predicted NO_2 annual mean concentrations being within 10% of the annual mean objective, and the uncertainty value of the modelling being >10% NO_x filtration will also be required.

Should the development be approved please attach the following conditions:

Generators
There shall be no installation of diesel generators to the building hereby approved.

Reason
In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Filtration
Prior to occupation evidence that an appropriate NO_x and Particulate filtration system has been installed as part of the ventilation strategy, and a detailed mechanism to secure maintenance of this system should be submitted and approved in writing.

Reason
To ensure that future occupants of the proposed development are not subject to elevated levels of air pollution that have been predicted in the local ambient atmosphere.

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

creating a better place
for people and wildlife

Environment Agency

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/02
Your ref: 24/00021/FULEIA

Date: 18 October 2024

Dear Anna,

Bury House 1 - 4, 31 - 34 Bury Street, London, EC3A 5AR.

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings.

Thank you for consulting us on the above application on 8 October 2024.

Environment Agency Position
Having reviewed the additional information submitted we have **no further comments** to our original response NE/2024/136844/01 sent on 26 March 2024.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Elizabeth Clements
Sustainable Places Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk | Tel: 02077644285

From: [redacted]
To:
Subject: Applications: 24/00021/FULEIA & 24/00011/LBC
Date: 24 October 2024 10:14:08

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Thank you for notifying the Group of the additional documentation submitted in regard to the above applications for Planning Permission and Listed Building Consent.

I have reviewed the additional documentation which does not address any of our original comments on the two applications. The Group therefore reinforces our objections to the scheme.

Kind regards,

Eddie Waller IHBC
Conservation Adviser
London and South East England



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Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

25 October 2024
Crossrail Ref: CRL-IP-3302

Dear Anastasia Tampouridou,

24/00743/FULEIA : Allianz House 60 Gracechurch Street London EC3V 0HR
Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments..

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 22 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/07072/OBS

Please reply to: Nikki Mitchell
Tel No: [redacted]
Email: [redacted]

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

Anna Tastsoglou
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

25 October 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/07072/OBS **Application Date:**

Date Received: 08.10.2024 **Date Amended:** 08.10.2024

Plan Nos: Letter from City of London dated 8 October 2024.

Address: Bury House, 31 Bury Street, City Of London, EC3A 5AR

Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.



From: Active Travel England Planning
To: Ipaburystreet
Subject: LPA Reference: 24/00021/FULEIA Standing Advice Response
Date: 30 October 2024 15:18:58

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00021/FULEIA

ATE Reference: ATE/24/00379/FULL

Site Address: BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw0000007FTlIAM;c56a80f3b2eecacb31a928cd5ce33117:ref]

From: CD - Airport Safeguarding/BAA
To: PLN - Comments
Subject: Re: Planning Application Consultation: 24/00021/FULEIA
Date: 31 October 2024 14:54:13
Attachments: image.png

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DIT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (aerops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 29 October 2024 14:52
To: CD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 24/00021/FULEIA

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London
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Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

01 November 2024
Crossrail Ref: CRL-IP-3311

Dear Anna Tastsoglou,

24/00021/FULEIA : Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 29 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

LPA Ref: 24/00021/FULEIA

London City Airport Ref: 2024/LCY/250

Date: 01/11/24

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found to have the potential to conflict with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

LPA Reference	24/00021/FULEIA
Proposal	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings
Location	1-4, 31-34 Bury Street, London, EC3A 5AR
Borough	City of London

Case Officer	Anna Tastsoglou

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

From:	SM-NE-Consultations (NE)
To:	PLN - Comments
Subject:	NE Response - 492545 24/00021/FULEIA
Date:	04 November 2024 12:17:54
Attachments:	image001.png ufm24_Standard_Consultation_Email.pdf 24_00021_FULEIA-COMMENTS_-_NATURAL_ENGLAND-1528366.pdf

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

Our ref: **492545**
Your ref: **24/00021/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **08 May 2024**, our reference number **470087** (attached).

The advice provided in our previous response applies equally to this **amendment.** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully
Joseph Cutler
Operations Delivery
Admin Support Advisor
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england



We strongly recommend using the SSSI Impact Risk Zones (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:29
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: 490304 Planning Application Consultation: 24/00021/FULEIA

[You don't often get email from plncomments@cityoflondon.gov.uk. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR . Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London
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7f1102%7C0%7C0%7C638639803404119861%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=R8%2F4WhVpYgP5o5s5BgeV8WgsCCgmrvMT6q5H1z02Ecg%3D&reserved=0

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From: [redacted]
To:
Subject: Bury House, 31 Bury Street, City of London EC31 5AR 24/00021/FULEIA
Date: 06 November 2024 09:49:54

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THIS IS AN EXTERNAL EMAIL

F.A.O Anna Tastsoglou

Our ref 199453

Your ref 24/00021/FULEIA

Bury House, 31 Bury Street, City of London EC31 5AR

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Dear Anna

Thank you for notifying the SPAB of the additional information provided in support of the above application.

We refer to our objection dated 14 May 2024 which has been registered incorrectly as a representation rather than a consultation response, as a result our response has not been included within the Response to Comments on Matters relating to Heritage, Townscape and Visual Impact of 16 October 2024. We request that this error be corrected promptly.

We also wish to reiterate our objection, particularly concerning the harm that the tall building would cause to the Bevis Marks Synagogue. The overbearing structure and the overshadowing of the courtyard constitute an unacceptable level of harm to the historic interest of the asset.

Additionally, the application fails to demonstrate that the proposals would enhance the Creechurch Conservation Area or provide any Heritage Benefit.

We therefore strongly object to the application and recommend that permission is refused.

We hope these comments are helpful to you.

Best wishes

Gill

Gill Pedler
Casework Officer

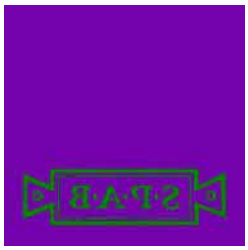
[redacted]
Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for pre-

application advice to casework@jcnas.org.uk

The Society for the Protection of Ancient Buildings (SPAB)
37 Spital Square, London E1 6DY | 020 7377 1644 | spab.org.uk
Follow @spab1877 on Instagram | Facebook | Twitter/X | LinkedIn

Charity no. 111 3753 | Scottish charity no. SC 039244 | Registered in Ireland 20158736 | Company no. 5743962



CONSULTATION RESPONSE: OBJECT

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

By email to: [redacted]

Our reference: 24025

6th November 2024

Dear Anna Tastsoglou,

24/00021/FULEIA | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Thank you for reconsulting SAVE Britain's Heritage on the above planning application following the submission of revised planning documentation. Following careful assessment of the amended documentation, we wish to reiterate our strong objection on the heritage and climate grounds set out in our previous detailed letter dated 1st May 2024, which this letter should be read alongside.

The revisions submitted by the applicant do not alter the fundamental nature of the application. We maintain our view that the proposed ground plus 43-storey tower at No. 31 Bury Street would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area within which the application site is fully located. The vastly increased scale of Bury House would overshadow a number of highly designated heritage assets which the conservation area is designated to protect. A building of this height would be visible from within the courtyard of Bevis Marks Synagogue, one of England's most important religious buildings of the highest significance, and would cause substantial harm to the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior.

The works proposed to Renown House and the Grade II* listed Holland House (in the associated application 24/00011/LBC) remain strongly concerning. We reiterate our view that the proposed scale and massing of a 4-storey rooftop extension to Holland House would be substantially harmful to this designated heritage asset.

70 Cowcross Street London EC1M 6EJ
T 020 7253 3500 E office@savebritainsheritage.org
www.savebritainsheritage.org
Registered Office No 2919??

This planning application has received over 1,300 objections. The government's own heritage advisor, Historic England, has strongly objected to the proposals, and five other national heritage bodies including Historic Royal Palaces, Georgian Group, Victorian Society, Twentieth Century Society and Historic Buildings and Places have registered their objections to the scheme. We consider this high-level of opposition adds considerable weight to SAVE's call that the Local Planning Authority refuse planning permission.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,

[redacted]

Lydia Franklin,
Conservation Officer

70 Cowcross Street London EC1M 6EJ
020 7253 3500 office@savebritainsheritage.org
www.savebritainsheritage.org
Registered Office No. 2151727

From:
To:
Cc:
Subject: FW: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date: 07 November 2024 14:06:55
Attachments:

THIS IS AN EXTERNAL EMAIL

Hi Anna
Thank you for consulting me on the Bury House application. The additional information supplied does not affect my previous advice, which I have attached for information
Regards
Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: 020 7973 3223 Mobile: 07551 134926

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

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 29 October 2024 14:56
To: E-Glaas <E-Glaas2@historicengland.org.uk>

Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou

Details
OUR REF: 24/00021/FULEIA
ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)
PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0048

Date of issue of this decision: 11/11/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0048 **Date of Issue of Decision:** 11/11/2024
Your Ref No.:

Applicant Ms Anna Tastsoglou
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Request for observations from City of London Corporation for 'Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works'.

At Bury House 1 - 4 31 - 34 Bury Street London EC3A 5AR

In accordance with your letter received on 23 October 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Anna Tastsoglou
Environment Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Housing and Regeneration Directorate
Planning and Building Control

Development Management
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Date: 11th November 2024

CITY OF LONDON REF: 24/00021/FULEIA

TOWER HAMLETS REF: PA/24/01869

ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

PROPOSAL:

24/00021/FULEIA – Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Dear Anna Tastsoglou,

Thank you for your correspondence dated 29th October 2024, informing the London Borough of Tower Hamlets (LBTH) about the City of London's receipt of additional information and revised drawings for the aforementioned Planning application.

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

LBTH previously submitted comments on 14th May 2024 objecting to 24/00021/FULEIA, and related LBC application 24/00011/LBC, due to the harmful impact of the proposals toward the Tower of London World Heritage Site.

As the revised drawings do not alter the height, scale, design or massing of the proposed new building, we maintain our original objection without further comment.

Yours sincerely,

Catarina Cheung
Planning Officer
For and on behalf of The Director of Planning and Building Control
The London Borough of Tower Hamlets

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

From: [redacted]
To:
Subject: C20 Society 24/00011/LBC & 24/00021/FULEIA FAO Anna Tastsoglou
Date: 11 November 2024 15:14:35
Attachments: image001.png
image002.png

You don't often get email from [redacted] Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

Thank you for re-consulting the Twentieth Century Society on the applications 24/00011/LBC & 24/00021/FULEIA. We have reviewed the submitted documents including KM Heritage's response to consultee comments dated 10 October 2024. We maintain our objection to the proposals as outlined in our letter of the 17 May 2024, remaining seriously concerned about potential harm caused to the Grade II* listed Holland House and Creechurch Conservation Area.

Kind regards,
Coco

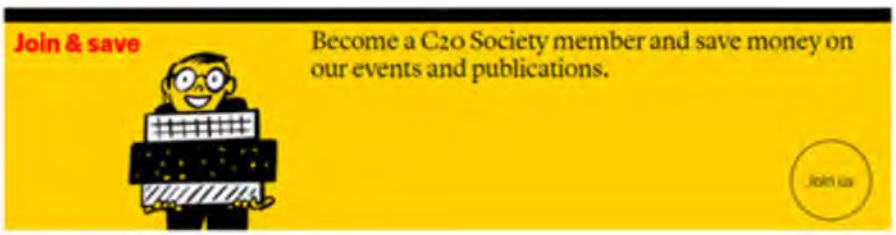
Coco Whittaker – Head of Casework
(she/her)
Twentieth Century Society
70 Cowcross Street, London, EC1M 6EJ

[redacted]
www.c20society.org.uk

Twitter | Instagram | Facebook | LinkedIn

Reg. charity no: 1110244





Date: 08 May 2024
Our ref: 470087
Your ref: 24/00021/FULEIA & 24/00011/LBC

City of London

BY EMAIL ONLY
lpaburystreet@cityoflondon.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

Thank you for your consultation on the above dated 14 March 2024 which was received by Natural England on 14 March 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Helen Churchill
Consultations Team

creating a better place
for people and wildlife

Environment Agency

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/03
Your ref: 24/00021/FULEIA

Date: 15 November 2024

Dear Anna,

Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR.

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings.

Thank you for reconsulting us on the above application.

Environment Agency Position
Having reviewed the additional information submitted we have no further comments to our original response NE/2024/136844/01 sent on 26 March 2024.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Should you have any queries regarding this response, please contact me.

Yours sincerely

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

Application ref: 2024/4348/P
Contact: Elaine Quigley
Tel: [redacted]
Email: [redacted]
Date: 15 November 2024

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

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

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
Bury House 1 - 4
31-34 Bury Street
London
EC3A 5AR

Proposal:
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Drawing Nos: City of London Cover Letter dated 8th October 2024.

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

Informative(s):

1 Reasons for raising no objection:-

The proposal includes the demolition subsequent redevelopment of the whole site as outlined in the description of development. The application for planning permission is an EIA application (24/00021/FULEIA). The London Borough of Camden were consulted on the original application in March 2024 and raised no objection advising that the application site is a significant distance from the London Borough of Camden boundary. The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions.

In light of the submission of additional information and revised drawings the London Borough of Camden continues to raise no objections to the application.

Yours faithfully



Daniel Pope
Chief Planning Officer

Memo

To Assistant Director (Development Management)
Environment Department

From Access Advisor
Environment Department
Telephone [redacted]
Email [redacted]

Date:
Our Ref: 24/00021/FULEIA
Address: 31 Bury St

The planning Guid application has been assessed to ensure that the proposal meets the highest standards of accessibility and inclusive design required by the NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1.

The Access Team promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

The proposal is for: **Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works**

Comments are structured to follow the journey through from planning a visit, arrival, entrance, travel through, and out from the site.

Summary of key issues

Engagement

Guidance in the London Plan is that there should be engagement with relevant user groups such as disabled, or older people's organisations. Some relevant groups are listed within the Statement of Community involvement.

There is no reference to a review of the current proposals by the City of London Access Group (CoLAG).

Good practice evidence provided

RIBA ID Overlay used?	CoLAG review	Access audit of existing buildings	EqIA	CoLSAT used?
No	No	No	Yes	No

Planning a visit

Preview, or prior information that is made available on websites is key to removing barriers to access for many disabled people. It is recommended this should be reserved by condition as part of the Inclusive Access Management Plan.

Arrival and departure

Aldgate station is 350m from the site and Aldgate East is 600m from the site. These stations do not provide step free access to the train. The nearest station providing step-free access is Tower Hill at 600m from the site. The nearest bus stop is 150m away on St Katherine Cree. It is noted that buses are not suitable for all people.

Parking

Whilst there is a high PTAL, step-free public transport routes to the site are significantly further than the recommended 50m from principal entrance points as set out in Inclusive Mobility and British Standard BS 8300 (1). Accordingly, disabled people may require access to parking, or drop-off at the site. It is recommended that details of rest points at 50m intervals and dropping-off are reserved through the Transport Management Plan and S278.

The Red Badge parking scheme is for disabled residents and workers in the City. Red Badge holders may park in pay and display and disabled persons parking bays in the City without time limits. Blue Badge holders may park for up to four hours in these bays and six hours in the bays nearest to St Bartholomew's hospital. Disabled people who hold a Blue Badge, but not a Red Badge, are be limited to four hours of on-street parking. London Plan T6.5 says for non-residential uses that 'at least one on or off street' disabled persons parking space is provided. A relevant

space is provided to be shared with the servicing bay. This should be reserved for use for free by the disabled persons parking bay only between the hours of 7.00am and 11.00pm for the life of the development. Details of controlled entry and use of the space, its layout and surface are reserved by condition. Arrangements for booking the space and its management are reserved as part of the Inclusive Access Managment Plan.

There are three existing on-street disabled persons parking bays in the vicinity of the development which should be re-provided if any are affected during the construction period and details reserved through the Construction Management Plan.

The servicing bay incorporates two short-stay cycle parking stands for cargo bikes. it is proposed that the servicing bay incorporates a disabled persons parking space for use between the hours of 7.00am and 11.00pm. Details of the space will need to be reserved by condition though the Transport Plan to ensure that it is adequately sized and set out with suitable protected zones, and available for the life of the development. These should be supported by details of its management secured through the Inclusive Access Management Plan (IAMP) and including information about priorities for booking and confirming that it will be free for use and available for disabled persons only for the lifetime of the development.

Dropping-off

Good practice guidance is that setting-down points should be positioned close to the accessible entrance of a building on firm and level ground. No drop-off points are identified in the proposals. It is recommended that details of secure drop-off on firm and level ground are reserved by condition and secured through Section S278 works.

Commented [BH1]: Let me know if we need to discuss.

Cycle parking

Cycle parking should accommodate a range of people, so as not to exclude or disadvantage riders of certain types of cycle. London Plan policy and London Cycle Design Standards recommend that 5% of cycle spaces should be suitable for larger cycles with associated, and appropriately-sized lifts and end-of-trip facilities. The 5% should be spread across both short and longer stay spaces. Routes to cycle parking should include no more than two sets of doors and those should be automated.

The application states that 5% of spaces for larger cycles will be provided.

Larger cycle storage spaces are provided at level B1 and Lower Ground Floor, accessed by a stepped entrance with cycle ramp or a cycle lift from the northern end of Heneage Arcade. The cycle lift is dual purpose, shared with refuse transfer. There is larger cycle parking at the southern end of the Lower Ground Floor which is not accessible by lift by larger and adapted cycles. It is recommended that details of accessible cycle parking, including controlled points of entry, swept paths, and end of trip facilities are reserved by condition in the TMP to ensure that all spaces are easy to access and are consistent with LCDS.

Larger cycle storage is at B1 or Lower Ground Floor. Cyclists will move between levels from the cycle storage via lifts A and F to access end of trip facilities on level B2. Cyclists requiring step-free routes will transfer from the cycle lift, put the cycle into storage and then move across to the passenger lifts in the central lift lobby. The cycle lift allows access to B2 but connects directly into the refuse store. Details of how this lift will be managed and cleaned are reserved by condition through the IAMP to maintain independent and dignified access and avoid inadvertent access to the refuse store. No mobility scooter storage charging or storage points are provided which is regrettable.

It is recommended that passive EV charging should be provided for all larger cycle spaces and details reserved through the Travel Plan.

Entrances

Guidance in the London Plan is that entrances should be easy to identify and accessed without undue effort, special treatment or separation. Automated sliding doors are proposed to principal entrance points, and for which step free access is provided. Step free access routes and sliding doors are welcomed. Sliding doors are more inclusive of a range of people than revolving doors, which reinforce separation and are not considered inclusive.

A new arcade will be created which will improve the permeability of the site and is welcome. Some of the units are shallow and may not have sufficient passing or turning space for wheelchair users. Details of all shopfronts should be reserved by condition to ensure that doors are of sufficient width and have suitable door furniture and surface contrast

Reception faciliites should be consistent with AD M(2) 3.6 and include facilities for both standing and seated visitors, have non-slip surfaces, lowered sections of any desks, options for seating and an audio induction loop. As these are not currently shown on the drawings details of reception facilities should be reserved by condition.

Vertical access

London Plan 2021 Policy D5 requires that at least one lift per core is a fire evacuation lift suitably sized for step-free access out from the building in addition to fire-fighting lifts. Two evacuation lifts are identified in the central lift core, with separate firefighting lifts.

Details of the management protocol for assisting people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition through the IAMP to ensure that there is sufficient training and awareness as part of the the building's management.

Reference is not made to the use of Easy Access to Historic Buildings. However, the proposals would bring greater access to the listed buildings and which is welcome in principle. The SCI indicates that some relevant disabled persons user groups were engaged during project development although there is not detail of how this has shaped the proposals. The proposals were not reviewed by CoLAG.

Culture/education space

An end-user has not been secured for the culture use and conditions are recommended to ensure that the cultural offer is inclusive of the greatest

range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

Sanitary facilities

Policy in the London Plan and Local Plan requires free, publicly accessible toilets for a range of people where there is major development, particularly when they are near significant attractions, public open spaces or existing transport interchange. Sanitary facilities will need to meet standards in both Approved Documents M and, the updated, T.

Changing Places toilets are a requirement of Building Regulations for certain types and/or scales of development. The criteria are set out in Approved Document M of the Building Regulations. Changing Places toilets are intended for people with multiple and/or complex impairments. They are not intended for independent use. A 'Changing Place' toilet is indicated on the proposed drawings, accessed from Heneage Arcade. This is not currently shown fitted out as a Changing Places toilet.

Under the reqiurements of current Building Regulations and relevant policy, separate wheelchair accessible toilet and baby changing facilities should also be provided as well as ambulant accessible toilets. Whilst indicative layouts show some scope for inclusive toilet provision this needs further development and an Inclusive Toilet Strategy is recommended to be reserved by condition encompassing the whole development. This should include , plans and relevant details at a scale of no less than 1:20 of Changing Places, wheelchair accessible, ambulant accessible, single sex and universal provision as well as baby changing facilities.

Landscape

Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and arm-rests for support when rising, as well as a wheelchair user to transfer.

Spend areas for assistance animals are not currently identified but could be reserved by condition.

It it recommended that details of all landscaping are reserved by condition including surface materials, planting, seating – with options to include seating with backs and arm rests for support- and spend areas.

Suggested conditions

Accessibility

Prior to commencement of development conditions:

Location of drop-off points on level surfaces within 50m of entrances (may go in Transport Plan?)

Details of disabled persons parking space including markings, protected access zones, hours of operation and signage to entrance points . This should include provision for passive EV charging. (again probably in TP?)

Details of to demonstrate how accessible cycle parking will meet London Cycle Design Standards Chapter 8 including: provision for passive EV charging, plans at a scale of no less than 1:20 to show layout, swept paths and dimensions, lift dimensions including internal cqr and door sizes; operational management to ensure that users requiring step-free routes cannot inadvertently access the refuse store and cleaning and maintenance of dual-function lifts

Details of access to inclusive end of trip facilities with relevant information made availalbe on the building management website

Statement for the construction period to demonstrate that disabled persons parking bay provision is maintained or the equivalent provided in alternative locations for the course of the works (CMP or TP?)

Details of all shopfronts including plans and elevations at a scale of no less than 1:20 to ensure that doors are of sufficient width and have suitable door furniture and surface contrast

Reception facilities to include non-slip surfaces, lowered sections of desks, options for seating and a hearing induction loop

Submission of an Inclusive toilet strategy including plans at a scale of no less than 1:20 of:

Location of wheelchair accessible toilets and proximity to all entrance points
Changing Places – identifying how the Changing Places standards set out in Approved Document M have been met, location and fit out and registration with the Changing Places Consortium
Details of ambulant accessible toilets and statement of how provision of ambulant accessible toilets meets Approved Documents M and T
Details of single sex toilets and universal toilet facilities
Location of baby changing facilities associated with cultural and retail use
Spend facilities for assistance dogs

Landscape and public realm details to include access to, and circulation routes including: door widths from the building, threshold and mat details, path widths and surfaces, passing places for wheelchair users, seating and furniture, planting to avoid highly scented plants or opportunities for unwelcome touch and lighting

All seating and furniture which should include recesses for wheelchair users or people with assistance animals to sit alongside companions, a range of seating heights, and options with of arm supports for rising, and back rests.

Inclusive Access Managent Plan

Prior to occupation of the development, an Inclusive Access Management Plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details of:

Preview information for website for each building use including travel distances, dimensions and photographs/visual stories to assist with visit planning for all building users:

Details of use of the disabled persons parking bay incudig its management, booking and frequency of relevant staff training

Details of any equipment loan for the building including, but not limited to wheelchair, noise cancelling headphones, information for culture spaces in alternative formats

Wayfinding strategy including how Information will be available in more than format

Information on publicly accessible toilet facilities including maintenance schedule and access to Radar keys and slings, as necessary

Cleaning and maintenance schedule for lifts to ensure that the lifts are kept clean, in good working order, and available at all times, with lift users kept separate from the refuse store

Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-creation, co-curation, mentoring and volunteering

Planting maintenance schedule

An inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs)

REASON: To ensure an inclusive and accessible development in accordance with Policy DM10.8 and Policy D5 of the London Plan

Yours sincerely

Harriet Bell

Access Advisor

Historic England

Ms Anna Tastsoglou
City of London Corporation
Environment Department
PO Box 270, Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: L01574353

18 November 2024

Dear Ms Tastsoglou

Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

HOLLAND HOUSE 1 - 4, 32 BURY STREET LONDON EC3A 5AW
BURY HOUSE 1 - 4, 31 - 34 BURY STREET LONDON EC3A 5AW
Application Nos 24/00011/LBC & 24/00021/FULEIA

Thank you for your letters of 29 October 2024 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Summary

In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall building would have harmed the grade I listed Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard.

The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective.

Historic England objects strongly to the applications and recommends they should be withdrawn or refused.

Historic England Advice

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We have set our position on these applications in detail in our letter of 15 May 2024 and continue to refer you to this advice. The recent amendments concern aspects of the detailed design which do not materially change the impacts on significance. The heritage commentaries submitted by the applicant in response to our advice do not provide any new information which changes our position.

We wish to draw the City Corporation's attention to the following points in light of further correspondence and information which has been submitted.

In our previous response we advised that given the similarities between the refused application and the current proposals, ICOMOS's previous advice remains relevant to the current application. As indicated in our email to the case officer on 24 July 2024, UNESCO's World Heritage Centre has welcomed Historic England's advice that the comments made by ICOMOS in its 2022 Technical Review of the previous application for this site remain relevant and should be taken into consideration in the local planning authority's determination of the current scheme. Please find this email and ICOMOS's Technical Review appended. We would encourage careful consideration to be given to ICOMOS's advice given the potential implications for the World Heritage Site.

We note the submission of the Lunar Transit Study Above The Bevis Marks Synagogue (GIA August 2024). This pertains to the Sephardi community's ability to practice the Kiddush Levana ritual - prayers performed outside at night to bless the new moon. A review of the Transit Study (BRE 04 November 2024) notes a significant reduction of visibility of the moon at relevant times of the lunar cycle as a consequence of the application proposals.

In our previous response, we highlighted the importance of the clear sky backdrop in the setting of the Synagogue to its significance, both in terms of its tangible and intangible contributions. As set out in 'The Setting of Heritage Assets' (GPA3) 'the asset's intangible associations with its surroundings, and patterns of use' and 'intentional intervisibility with other historic and natural features' (which we take to include the celestial bodies) are relevant to the consideration of impacts on significance. We defer to the expertise of the Sephardi community on their traditions and the impact of the proposals on their ability to worship, but note the clear link to heritage significance raised by this point.

In addition to the harm to the Tower of London and Bevis Mark Synagogue, we have also previously set out how the proposals would harm the significance of Holland House and the Creechurch Conservation Area. For the purposes of the NPPF, we find that the harm to the former would be in the middle of the range of 'less than substantial' and in the lower part of that range for the latter.

Historic England continues to object strongly to the current proposals. We consider

they would harm designated heritage assets of the highest possible significance, including the Tower of London and Bevis Marks Synagogue, contrary to planning legislation, policy and guidance. We do not support the development of a building of the scale proposed in this location due to the inevitable harmful impact it would have on the historic environment.

We consider that the reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal would result in a worse impact in this case.

Recommendation

Historic England strongly objects to these applications. We recommend that they are refused or withdrawn.

We will update the Department for Culture, Media & Sport (DCMS) in its role representing the UK State Party to the 1972 World Heritage Convention, about the recommendation in your report and the decision of your Planning Committee. This is in order that they can update UNESCO World Heritage Centre on this case in accordance with Paragraph 172 of the Operational Guidelines.

We have not authorised the granting of listed building consent and will review our position on that matter after your Planning and Transportation Committee has met.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [redacted]

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

HISTORIC ROYAL PALACES

Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

FAO Ms Anna Tastsoglou
By email to [redacted]

21 November 2024

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

Dear Ms Tastsoglou,

We write in relation to the recent re-consultation on the above referenced planning and listed building consent applications, to reiterate HRP's strong objection to the scheme, which relates to the redevelopment of the site that includes Bury House, on the basis of its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS).

HRP previously made representations to the City of London (CoL) in respect of this application in May 2024, during the initial consultation period. We do not repeat the detail of that representation here but note that the scheme does not appear to have changed in any meaningful way since then and therefore the **original objection** (dated 13 May 2024) still stands. While we note the response to comments made by HRP prepared by The Townscape Consultancy, **HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS** by virtue of the position and height of the proposed buildings and their impact on key views from and of the ToL.

In this letter we provide more detail about some of the issues raised in the original objection, highlight the changing policy context for consideration of the proposals, and raise a new concern about the misrepresentation of HRP's opinion of the emerging scheme during pre-application consultation which we ask CoL Officers to consider alongside HRP's original letter of representation in the determination of this application.

Historic Royal Palaces
Tel +44(0)20 3166 6000 www.hrp.org.uk
Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)
The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

HISTORIC ROYAL PALACES

Growth of the City Cluster

The growth of the CoL tall buildings cluster over the last 15 years, particularly the rapid development of new high-rise buildings, represents growth beyond that which was first envisaged when the LVMF was first published in 2012. The growth in tall buildings has resulted in cumulative impacts which HRP considers are threatening the OUV of the ToL WHS. HRP considers the emerging CoL Local Plan to 2040, which proposes additional height in the cluster, would further exacerbate the harm to the OUV through its promotion of an expanded eastern edge to the cluster and additional height. HRP believes that the Bury House development, along with the emerging CoL Local Plan 2040, to be a significant threat to the status of the WHS and as such maintains its objection both to this application and the emerging City Plan 2040.

Harm to the OUV of the ToL WHS

HRP remains of the view that the proposed development would harm the OUV of the ToL WHS. The original representation (May 2024) set out the unacceptable impact of the proposals on views of the Tower of London from Tower Bridge (LVMF 10A.1), in the dynamic journey across Tower Bridge, in the local views from within the inner ward of the Tower (in particular the view north-west from the centre of Tower Green over the roof of St Peter and Vincula), and on views of the White Tower, which is compromised by the erosion of the visual separation from the emerging City Cluster.

This is contrary to the guidance of the LVMF, in relation to View 10A.1 which states that '*Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site*' (LVMF para 186).

HRP notes the Townscape Consultancy response to the HRP comments made in May 2024. However, HRP maintains its position and does not agree with the conclusions in that response. In relation to View 9 in the TVIA (LVMF View 10A.1), HRP does not agree that '*in the cumulative condition the height of the proposed development would better mediate the cliff edge caused by the consented scheme at 100 Leadenhall*'. HRP considers the height would in fact exacerbate the abrupt vertical cliff edge in this view, resulting in a domineering and overbearing relationship to the ToL White Tower in this view.

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In relation to the Townscape Consultancy comments on View 22, from the ToL Inner Ward, HRP maintains its comments. While the wire line shows the proposed development occluded in this view, the cumulative impact view in the TVIA clearly shows a development visible over the top of the Royal Chapel of St Peter and Vincula. This further highlights HRP's concerns about the growth of the city cluster overall and the damaging impact this is having on the ToL.

Policy Considerations

The proposals are contrary to numerous policies in the adopted CoL Local Plan (2015) and draft City of London Plan 2040 which seek to protect the ToL WHS and its setting. In the adopted Plan: Policy CS12 (Historic Environment) requires development to preserve and where appropriate enhance the OUV of the ToL WHS and its local setting; Policy CS13 (Protected Views) requires development to protect and enhance significant City and London views of important buildings, townscape and skylines (including the ToL); and, Policy CS14 (Tall Buildings) requires tall buildings proposals to have regard to the significance of heritage assets and their settings. HRP considers that the current proposals are not in accordance with these policies because they demonstrably harm the OUV of the ToL WHS, impacting on its setting and views of the White Tower. The application should therefore be considered a departure from the development plan and refused.

In the emerging Plan, strategic policy S11 (Historic Environment) states that the CoL will preserve and seek to enhance the OUV, architectural and historic significance, authenticity and integrity of the ToL WHS and its setting; Policy HE1 (Managing change to the historic environment) requires that development preserves and where possible enhances and better reveals the special architectural or historic interest and the significance of heritage assets and their settings; and, Policy HE3 (Setting of the Tower of London World Heritage Site) requires proposals affecting the setting of the ToL WHS to preserve and enhance its OUV, architectural and historic significance, authenticity and integrity. Furthermore, strategic policy S12 (Protected Views) states that CoL will secure an appropriate setting of and backdrop to the ToL WHS and ensure its OUV. HRP therefore considers that the proposals for Bury House, given the harm they will cause to the OUV of the ToL WHS, are also contrary to emerging CoL policy.

HRP's concerns about the harm to the ToL OUV are made clear in the images provided in the ToL HIA submitted with the Application, particularly Figures 5.3 and 5.4. These images show that the proposed development sits demonstrably apart from the established City Cluster and that this is beyond what could reasonably be interpreted as denoting the

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‘edge’ of the cluster, clearly intruding on views of the ToL and particularly the White Tower. Moreover, the reference in the ToL HIA to the proposed development representing a stepping down to the ’foothills’ of the Cluster is also contradicted by these images, which clearly demonstrate that –even at its ‘reduced’ height, compared with the previous, rejected proposals - it is a similar height to other buildings in the centre and foreground of the cluster and not significantly or visibly diminutive.

In its response to the CoL draft City Plan 2040 (letter dated 29 May 2024), HRP referenced the growth of the City Cluster and highlighted that the proposed profile of the cluster set out in the draft Plan (which appears to be designed to incorporate the Bury Street proposal) pushes the tall vertical edge of the eastern shoulder too close to the White Tower. HRP has regularly and consistently highlighted the danger posed by the proposed development to the ToL WHS over a prolonged period of time and strongly requests that all of these representations are carefully considered in the determination of this application.

Changing policy context

In its original objection to this 2024 scheme, HRP highlighted the reliance in the submitted Planning Statement on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal, pointing out that only limited weight could be attributed to the emerging plan given the early stage of its preparation, with significant objections remaining to the tall buildings policies and proposals in the draft document. Since then, the draft Plan has been submitted for Examination in Public, however the process is in the relatively early stages (it was submitted at the end of August and Inspectors were appointed in September; no date is currently indicated for the hearings) and therefore only limited weight can continue to be attributed to these draft policies. Furthermore, we have demonstrated above that elements of the proposals are not compliant with either emerging or adopted policy. HRP believes that the extent to which the proposals can demonstrate compliance with CoL policy, particularly in relation to heritage harm and tall buildings, is overstated in the application submission documents.

It is also clear that the development of the City Cluster, in both scale and height, is now beyond anything that was envisaged when the current version of the LVMF was published. HRP is aware that the LVMF is currently under review and understands that further protections will be afforded to the Tower of London and the White Tower to recognise the threat to its OUV from development in a future version. HRP requests that CoL Officers have regard to this likely update to the LVMF and consider its implications in the determination of this application.

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HISTORIC ROYAL PALACES

Misrepresentation of HRP comments on the emerging scheme

HRP notes the statement in the Planning Statement (para 2.30) which refers to the way in which the 2024 submission seeks to address the reasons for refusal of the 2020 scheme: that '*The Applicant has also worked with key stakeholders including the GLA, Historic Royal Palaces ('HRP') and Historic England ('HE') to address the second reason for refusal. In this regard, HRP feedback acknowledged that there was "much to welcome in the new design proposals, particularly in respect of the existing incongruous extensions to Holland House, bringing public use to Holland House, and the reduction of height and introduction of shoulder elements to the tall building", which were described as helpful in key views. It was acknowledged that the "height of the massing would re-establish a softer edge in the foothills of the City Cluster that would mitigate to some extent against the 'cliff edge' created by consented developments*". The Planning Statement concludes on this point (para 2.31) that there is '*consensus from the GLA, HRP and the HE that the height reduction represents a positive change from the previous scheme, but some concern remains in respect of the overall height of the scheme*.'

HRP takes issue with this presentation of its view of the current scheme, which overstates its assessment of the advantages of the current scheme compared with the previous rejected scheme, and suggests that its remaining concerns are minimal and entirely addressed in the Heritage Assessment, HTVIA and Design and Access Statement submitted as part of the current application. The quotes presented in the Planning Statement are from an email exchange immediately following an online presentation of the scheme by the Applicant to HRP, and omit other important issues raised by HRP in that email, including that '*the massing in LVMF view 10A.1 (from the northern bastion of Tower Bridge) still appeared tall and close to the White Tower*'. This position was set out in more detail in HRP's follow-up formal objection letter dated 13 May 2014.

Historic Royal Palaces therefore continues to strongly object to the proposed development, which would harm the OUV of the Tower of London WHS and which therefore does not comply with CoL adopted or emerging Local Plan Policies, the LVMF and NPPF. We therefore request that the City of London refuses the application as currently presented.

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HISTORIC ROYAL PALACES

Please do not hesitate to get in touch with me should you wish to discuss any of the points raised here.

Yours sincerely

[redacted]

Adrian Phillips
Palaces & Collections Director
[redacted]

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[redacted]

From: Varma, Vimal <[redacted]>
Sent: 24 November 2024 3:21 PM
To: Tastsoglou, Anna <[redacted]>
Cc: Turner, Lee <[redacted]>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street

Hi Anna,

The proposed waste and storage collection facilities indicated on drawings no. 4458-ST-PR-02-100 & 4458-ST-PR-02-097 and in the Delivery and Servicing Plan, Jan 2024, comply with our requirements. Therefore, this division will not object to this proposal.

Thanks

Cimal

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:37

To: Varma, Vimal <[redacted]>; Turner, Lee
<[redacted]>
Subject: Planning Application Consultation: 24/00021/FULEIA

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

Ministry of Housing, Communities & Local Government

Anna Tastsoglou
Principal Planning Officer
Development Management
City of London Council

Sent via e-mail only to:
[redacted]

Please ask for: Maria Bowen

Tel: [redacted]

Email:

Your ref: 24/00021/FULEIA and 24/00011/LBC

Our ref: PCU/RTI/K5030/3352878

Date: 19 November 2024

Dear Ms Tastsoglou

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

Application by WELPUT for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works at Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR. Planning Application Numbers: 24/00021/FULEIA and 24/00011/LBC.

1. I am directed by the Secretary of State to refer to the above planning application.

2. In exercise of her powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Secretary of State hereby directs your Council not to grant permission on this application without specific authorisation. This direction is issued to enable her to consider

Planning Casework Unit
Ministry of Housing, Communities & Local Government
23 Stephenson Street
Birmingham
B2 4BH

Tel: 0303 44 48050
PCU@communities.gov.uk

whether she should direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to her for determination.

3. This direction does not, of course, prevent your Council from considering the application, forming a view as to the merits or, if they are so minded, refusing permission.

4. This letter is for procedural purposes and should not be read as any indication of the Secretary of State's attitude towards the application scheme.

5. I would be grateful for acknowledgement of your receipt of this letter. Please contact the case officer if you have any queries.

Yours sincerely

Maria Bowen

Maria Bowen
Head of Crown Casework
Planning Casework Unit

Authorised by the Secretary of State to sign on their behalf

The decision to issue this Article 31 was made by officials on behalf of the Secretary of State under delegated powers.

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Transport for London

lpaburystreet@cityoflondon.gov.uk

Transport for London
Crossrail
Safeguarding
5 Endeavour Square
LONDON

21 March 2024
Crossrail Ref: CRL-IP-3125

Dear Anna Tastsoglou,

24/00011/LBC : 1-4, 31-34 Bury Street, London, EC3A 5AR
Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter 14 March 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00011/LBC
Our Ref: 220216

Contact:
Helen Hawkins
02079733223
helen.hawkins@historicengland.org.uk

2nd April 2024

Dear Anna,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021

Holland House 1 - 4, 32 Bury Street London EC3A 5AW

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works

Recommend Archaeological Condition(s)

Thank you for your consultation received on 14th March 2024.

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

Assessment of Significance and Impact

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

The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.

All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation.

The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here.

It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is therefore recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. in the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be carried out.

A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

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

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall

take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial

trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Public engagement

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

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

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

Yours sincerely

Helen Hawkins

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

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

REFVAL	SURNAME	FIRST NAME	COMMENT	RESTRICTED COMMENT	HOW RECEIVED	DATE
24/00021/FULEIA	Harris	Geraldine	This is totally inappropriate when a previous proposal was rejected. The building would be too near to the Synagogue and would block the light inside and would take away the beauty of the building.	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Kovalskyi	Volodymyr	I don't understand the previous objections regarding the endless "we are plunged into the darkness" - utterly absurd, as this scheme should have been given a green light a while ago. A waste of time and money when the city really needs it. I think it's gonna be a game-changer for our city skyline, adding some serious flair and modernity to the scene. The most eye catching element here is the terracotta cladding. This area is one of the few places where tall building are allowed. You can not stop the progress. Many big companies are leaving Canary Wharf for City of London - the building would not stay empty for long.	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Shollar	Leah-Perl	I was shocked to hear about the recycled proposal for a tower to be built adjacent to the historic Bevis Marks synagogue. This is a building that stands as a testament to a unique period in British and Jewish history. The synagogue and it's congregation are one branch in an association of Spanish-Portuguese Jewish communities around the world. This is the synagogue of Benjamin Disraeli 's father and of Moses Montefiore. It's unconscionable that its standing or functioning should be harmed or impinged upon. If this were an historic church or mosque would this step even be considered? Please come down on the right side of history. We owe it to our future generations.	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Fox	Nicola	protection of a unique historical synagogue of which so few remain in London - our cultural heritage must be secured	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Marrache	Jacob	Save the historic nature of the neighbourhood. So much of it has already been lost. Save Bevis Marks synagogue from being overshadowed and lost between a jungle of skyscrapers.	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Martin Wright	Julia	Having read the new application I cannot see how this is materially different from the previously rejected application of two years ago which would have had a deleterious impact on Bevis Marks. As Bevis Marks now sits within a conservation area, the building and its immediate environs has been recognised as an area of the City of special historic and architectural interest worth preserving now and for generations to come. This new planning proposal will do nothing to preserve the particular character and historic significance of Bevis Marks and the surrounding area.	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Shelper	Jonathan	Keep it looking traditional. That's what we have to preserve.	NO	Public Access	15-Mar-24
24/00021/FULEIA	GURNEY	DAVID	I'm not Jewish but I work in the city round the corner from bevis marks on mark lane. Please don't destroy the history of the CoL for yet another massive tower we don't need as occupancy rates plummet. Enhance the environment to increase take-up. Please don't build another soleless block to sit empty for years	NO	Public Access website	15-Mar-24
24/00021/FULEIA	Skellon	Katherine	Bevis Marks synagogue is a unique and significant historic building that needs to be protected from this planning proposal and future ones.	NO	Public Access website	16-Mar-24
24/00021/FULEIA	Hughes	Tricia	To preserve and not overshadow synagogue and historical area of London.	NO	Public Access	16-Mar-24
24/00021/FULEIA	Lawson	Robert	This should be objected to as it would leave the nearby historical synagogue in darkness.	NO	Public Access	16-Mar-24
24/00021/FULEIA	Odebi	Idris	The tower looks high quality and sleek and will enhance londons skyline and forge greater growth in high quality office space which is imperative for londons economic development.	NO	Public Access website	16-Mar-24
24/00021/FULEIA	Crew	Steve	Great proposal, fitting for our global city. Why was it ever refused in the first place?	NO	Public Access	16-Mar-24
24/00021/FULEIA	Arenas Martinez	Ivan	Really like the facade of this building, I think it would be a phenomenal addition to the skyline.	NO	Public Access website	16-Mar-24
24/00021/FULEIA	W	A		NO	Public Access	18-Mar-24
24/00021/FULEIA	Brady	R	I support this development as its a high quality design which will help maintain London's position as a premier financial centre and a can do global city in which to do business, invest and create jobs and thus be a net benefit to the local economy and wider UK economy. The current office buildings are tired, unattractive to business and hard to let. New office space will attract business, create jobs and help support local service based businesses and pay much needed local taxes. The usage of the synagogue is unaffected by this proposed development, likewise the opinion of a religious organisation who's building is used occasionally by a small group of people and should not be detrimental to job growth and tax income for the local community.	NO	Public Access website	18-Mar-24
24/00021/FULEIA	Varsamis	Dimitri	* We really really really don't need another super tall empty office block to sit there, or for companies to move into it by vacating other existing offices in the City. * Despite the long reports by 'specialists' who will write what you pay them to write, ultimately this design will overshadow literally and figuratively the nearby synagogue. * A similar design with little material difference was objected 3 years ago. * The carbon emissions due to building a 40+ storey building are unacceptable. * The Holland House design is not sensitive to the original art deco look. The addition of white tiles doesnt go with the austere look. * And definitely the addition of yet more 2 floors on top, cladded in awful white stripes dont either just because they are the same width apart as the original lines, it doesnt make the extra floors look right. Any changes to Holland House need to be in muted weathered concrete look (and ideally not add yet 2 more floors). * Update the existing Holland House, and ideally Bury House, by retrofitting.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Beloff	Jonathan	I do not understand the City of London's constant threat to my synagogue, Bevis Marks. This synagogue is over 300 years old as it contains the first Jews allowed back into the United Kingdom after the 13th-century expulsion. At this time, with increased anti-semitism and attacks at Jewish institutions, I would suspect that the City of London would try to show itself as an international city that respects all faiths. However, it continues to illustrate that some people can be ignored, which justifies anti-semites' belief that Jews are not welcome. The developers of the tower block have not, in good faith, engaged with Bevis Marks Synagogue or the Jewish community, which uses the synagogue as their religious centre. The tower will overshadow the synagogue, posing a significant security threat and hampering Jewish practice, which requires uninterrupted access to the southwestern corner for light in our religious practices. The proposed Creechurch Conservation Area was to protect not only Bevis Marks Synagogue but the unique architecture and history of the region. However, many within the community feel that they were intentionally misled, with the exception of this 45-storey building. If the City of London does not care about Jews or protected minorities, especially in this climate of divisionism and hatred, it must be at least honest with its intentions. History is now being made. Will the City of London repeat the mistakes of the past by dismissing Jewish concerns or stand on the right side of history and actually follow through on their commitments to protect all those who reside and engage in the City and protect Bevis Marks Synagogue? Don't allow this massive building to be built that will greatly harm the longest-serving Jewish community in the UK just for some office space that will most likely be empty with the hope of 'future occupency'. Do the right thing. Bevis Marks Synagogue must be protected from this unnecessarily large construction protect that will	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Garson	Raphael	This special site should not be blocked by a new tower block. The lighting is limited it as it is. It would be a disaster for worshipers.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Bonnet	Joel	Bevis Marks Synagogue is a Grade 1 listed building and the oldest continuously used synagogue in Britain, dating from 1701. A 45-storey structure would completely overwhelm the synagogue by overshadowing its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations and would further reduce daylight in the synagogue, making it even more difficult to conduct worship. The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Kimhi	Emmeli	Will destroy the setting at this important historical sight for Jews in London but also Jews all over the world visiting the synagogue	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Millunchick	Samuel	This tower along the synagogue's southern horizon would destroy the setting of the synagogue, which is so important to traditional ritual and to what makes the synagogue a community hub, and would reduce the synagogue's natural light levels beyond usability.	NO	Public Access website	19-Mar-24

24/00021/FULEIA	Knott	Wendy	At 300 years old Bevis Marks Synagogue runs along the edge of this development. Building a 45 storey towerblock will reduce the natural light within the Synagogue to an unusable level. It will make holding prayer services and community events untenable. It will also destroy the unique setting of the Grade 1 building, which is so crucial to the community and to the ritual of its hub.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Reginald	S	London's status as a global city has been on decline since 2020 when we stopped dreaming big and focus on the opinions of small but very vocal groups of people. - The City is already cornered on all sides by restrictions, from St Paul's sightlines in the West, Tower of London silhouettes in the East, height limits imposed by the CAA, ancient roman streets and many, many conservation areas. - Why we stopped progressing and lost our vision for the future, I'm not sure. - This tower is of high quality design, much better than the glass blocks i've seen going up around it. It's not too tall and would fit wonderfully in the 'mountain' that is our City cluster. - The City's 2040 plan highlights the need for millions of square feet of office space, where will you find that space if you keep rejecting every new tower proposal? - I think Councillors should seriously rethink what position London stands at in the world and whether focusing on NIMBYism and economic regression is really the way forward here?	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Toff	Penelope	The Bevis Marks synagogue is the jewel in the crown of British Jewry and I am personally connected to it, as my ancestors were among those who sold their land in the 17th century, so that this beautiful and significant landmark could be built. Having recognised its historical, cultural and architectural significance, it is beyond credibility that the prestigious City Corporation would not immediately act to protect the building's integrity inside and out, as well as that of other heritage buildings nearby, by rejecting this re-application to build a 45-storey tower - utterly out of keeping with this unique setting, which is furthermore a conservation area. It has already been clearly demonstrated that the proposed tower would block natural daylight and obscure the view of the sky, which are both so vital a part of the worshipper and visitor experience of being in this unique and sacred environment. The synagogue courtyard would be overshadowed, making it impossible to conduct meaningful rituals and services outside - in effect destroying the rights of those using the building to enjoy it peacefully and in full for the purpose for which it is intended. The City Corporation is entrusted with guardianship of the area in its entirety and as a whole and welcome as its efforts toward sustainability and reducing traffic are, these would be expected as part of any contemporary planning and are not a substitute for the proper preservation of each historical asset, with their and their users' own unique needs, in line with equality legislation and good practice. This also includes greater efforts to conserve buildings wherever possible, for example Holland House, rather than destroy and rebuild. I hope that the City Corporation will seize this opportunity to be on the right side of history and reject this building application, in order to properly protect the integrity of this precious resource for future generations.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Green	Michael	I am regular worshipper at Bevis Marks and I am concerned about the impact this building will have on the available light and access to Bevis Marks Synagogue	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Orenstein	Joe	As before with the last application the proposed design is not of a design which is in keeping with the scale, character, or appearance of the conservation area and will impact the 300 year old Grade 1 Listed Bevis Marks synagogue which should be protected at all cost. This proposal along the synagogue's southern horizon would destroy the setting of the synagogue, which is so important to the community and its rituals and would reduce the synagogue's natural light levels beyond usability as the synagogue relies predominately on candlelight. I therefore consider that the proposal is contrary to the new conservation area that was meant to protect synagogue from over development and request that the planning application is refused.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Ledman	Rebecca	It would overshadow the Historical Buildings of Central London and put the Historical Synagogue in the dark.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Cabrera	Carlos	For the second time in two years a developer is proposing a 45 storey tower a stone's throw from Britain's Jewish "cathedral" - the 300 year old Grade 1 Listed Bevis Marks synagogue. This tower along the synagogue's southern horizon would destroy the setting of the synagogue, which is so important to traditional ritual and to what makes the synagogue a community hub, and would reduce the synagogue's natural light levels beyond usability. The City does not need another useless behemoth skyscraper.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	O'Connell	Theresa	These plans will seriously impact the southern light aspect of Bevis Marks Synagogue and therefore will have an impact on religious rituals and rites. Bevis Marks Synagogue is an important part of the heritage of the City of London and many people would like the character of this beautiful building to remain unchanged and to be able to fully function as a Synagogue within the City of London.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Van den Bergh	Martin	Like the previous proposal which was rejected, this proposal will be detrimental to the historic Bevis Marks Synagogue. The Synagogue not only serves its members and visitors. It has been the venue for many City of London occasions as well as national and international celebrations and commemorations. For the short time that I served as interim Rabbi I personally officiated many such events as well as weddings and life cycle events. The building proposal will diminish the unique character of the Synagogue and will also impact on its standing as a national treasure, not only for the Jewish community, but also for the City of London and as centre of interest for visitors from over the whole world.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Kendall	Rebecca	Bevis Marks is over 300 years old and an incredibly important place of worship for the Jewish community. This 45 storey tower will greatly diminish the synagogue's natural light and reduce usability for this important and historic landmark.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Altneu	Emily	I have previously objected to this development. I have visited Bevis Marks synagogue many times. It is vital that this synagogue does not sit in darkness. Equally that it keeps the privacy of a place of worship - not towered over by an office block. London is a unique city for it's history. Too often this is now being overshadowed. It will lose it's character. If this building was next to somewhere like St Paul's it would never be built. We cannot overshadow our Grade 1 listed buildings. Too many were bombed in our previous wars. Let's preserve what we have left. Why not refurbish the existing building? What use is a conservation area if this is allowed to be built - you are undermining the quality of London.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Barnett	Ian	Total inappropriate and unnecessary infringement of both h space and light in this historic religious building in constant use. It would be a total dereliction of your duty to allow this or any other similar structure to be erected . There is already an abundance and oversupply of commercial etc buildings nearby and saturation of new developments . The recent decision of two years or so ago to refuse permission for another similar structure on much the same grounds should carry forwards indefinitely.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Souroujon	Stephanie	This is being built adjacent to one of the most important jewish buildings in Europe. The proposed construction would ruin an important architectural feature as it would block the courtyard. There shouldn't be any tall buildings next to such an important monument.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Stone	Lee	The nearby synagogue is an institution and a landmark. It is crucial and part of its essence to have clear views to to the South to preserve the natural light and no tower block should even be built which would obscure this.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Pitts	Jonathan	Bevis Marks synagogue was opened in 1701. It's very sad to see over 300 years of history potentially being overshadowed by a big new building.	NO	Public Access website	19-Mar-24
24/00021/FULEIA	Forbes	Karen	Why do you need this building next to a snyagoge	NO	Public Access	20-Mar-24

24/00021/FULEIA	Querfurth	Keren	Creechurch CA sits within the City Cluster - an area considered sensitive to tall buildings. City Plan 2040 Jan 2024, cites the importance in considering, 'inappropriately sited tall buildings can have an adverse impact on [..] designated heritage assets [..] and their settings. They can undermine the character of a place [..] cause adverse environmental impacts such as reduction in daylight [..] and overshadowing.' [Pt 3.5, CP 2040]. The paper highlights the importance of setting to BM Synagogue: 'Where the setting, immediate or otherwise, of a listed building contributes to its significance, then tall building proposals would be sensitive. An example would be BM Synagogue, where the low-midrise buildings enclosing the synagogue and its courtyard are an element of setting which contribute positively to its significance. This sense of enclosure is therefore sensitive to tall building development.' [Pt 9.105, CP 2040] Observations relating to tall buildings and the future of the City Cluster are made by Historic England Note 4 Tall Buildings (HEAN 4): '[..] the tall buildings proposals were likely to [..] come forward in locations and at heights that would cause serious harm to [..] key heritage assets.' Historic England require planning apps to be supported by Heritage Impact Assessments (Pg 31, HEAN 4). This application provides a Heritage Statement relating to the development of Holl Hse (low rise) and a Heritage Impact Statement relating to the impact on the TofL. We see no Heritage Statement relating to the impact of the proposed tall building on the setting of BM Synagogue, a listed heritage asset. CP 2040 requires the testing of individual tall building proposals against the requirements of the NPPF. This includes giving 'weight to the conservation any heritage asset's significance, including how this is appreciated through the asset's setting. (Pt 25.4, CP 2040).	NO	Public Access website	20-Mar-24
24/00021/FULEIA	Waterman	Dov	My family and I are regular users of Bevis Marks Synagogue. The courtyard setting, with its mid rise buildings allowing views to the southern sky, are imperative and form a cohesive part of the heritage of the synagogue and of the experience of the user. The setting of this heritage asset will be adversely impacted, and diminished, with the blocking of the southern sky by the proposed tall building.	NO	Public Access website	20-Mar-24
24/00021/FULEIA	Lebon	Scott	I support this impressive proposal. The provision of affordable workspace to small companies will be very beneficial to new and starting enterprises. At a time of increased cost of doing business, this is very welcome. This location is very close to the Gherkin and other major developments, so suitable for a tall building. It is aesthetically pleasing and constitutes a step down from the taller elements in the cluster. It will contribute to the visual coherence of the City cluster London is a dynamic city and always changes. If one listened to NIMBYs, nothing would ever get built.	NO	Public Access website	20-Mar-24
24/00021/FULEIA	de Vries	Arnold	The application would block the light into a national treasure. It is used by the public and is also a tourist destination that should be celebrated and protected for us and future generations.	NO	Public Access website	22-Mar-24
24/00021/FULEIA	Ehrenzweig	M	This development would knowingly block the historic views of and from Bevis Marks synagogue which is a crucial landmark in the history of London and the Jewish contribution to London life. It serves as a religious and cultural place of observance which relies on the sun to determine prayer times. If this development is built it will block out the vital sun view and light incoming which makes the synagogue special and functional. It is more important than ever to preserve the historical and cultural way of life special to this part of London City's heritage. Please do not spoil this ancient religious and cultural place of workshop for a building that no one will remember.	NO	Public Access website	22-Mar-24
24/00021/FULEIA	Silver	Lorraine	Bevis Marks is a Grade 1 listed building and its historical presence needs to be preserved. The proposal would cause loss of natural daylight to the Synagogue and its courtyard. The planning application should be refused as construction of the new building would be severely detrimental to the oldest Synagogue in London.	NO	Public Access website	22-Mar-24
24/00021/FULEIA	Stolerman	Professor Ian	The development site is within the Creechurch Conservation Area. Its placement there would make a mockery of the concept of conservation areas and discourage its use in the future. A gigantic tower would bury a Grade 1 Listed building of enormous historic and cultural significance. The building would overshadow the courtyard for much of the day, reducing its usefullness for religious events and for community gatherings. There would be no view of the sky, a vital part of the setting of the synagogue. The tiny amount of daylight that at present reaches the synagogue would be reduced even more.	NO	Public Access website	25-Mar-24
24/00021/FULEIA	Nyman	Susan	the synagogue would be overwhelmed by a 45 storey tower. It is a grade 2 listed building of great historic and cultural importance. It would destroy the southern skyline of which the setting of the synagogue is part. A 45 storey building would completely overshadow the synagogue. I cannot see any planning benefits that such an enormous tower would have in the context of Bevis Marks and the City. I am very sad that we keep having to go through this fight to save our heritage in Bevis Marks.	NO	Public Access website	25-Mar-24
24/00021/FULEIA	Kramer	Miriam	After rejecting the initial application the City is now considering a similar one. To be blunt, a 43-storey building will overwhelm and dwarf Bevis Marks Synagogue, which has been on the site for some three centuries and is Grade 1 listed. The synagogue and its courtyard will be overshadowed for much of the day. In addition the proposed development is in the Creechurch Conservation Area. The City's current planning policy is not to allow tall buildings in conservation areas, so how can this be justified? Its erection would compromise the setting of other heritage areas as well as the quality and integrity of this particular one. The Corporation of London, on the one hand, recognises the importance of Bevis Marks Synagogue but on the other facilitates this eyesore in the wrong place. I object very strongly on all the grounds described above.	NO	Public Access website	25-Mar-24
24/00021/FULEIA	Leon	Jean	I agree with all the other comments about the damage this would do for the synagogue, and the wider Jewish community. At a time when British Jews are facing such isolation and discrimination as it is, this is a horrific and thoughtless proposal. Please reconsider and stick to your own word. Protect the synagogue, this space and the Jewish community.	NO	Public Access website	25-Mar-24
24/00021/FULEIA	Ross	Xander	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. At a time when British Jews are facing such isolation and discrimination as it is, this is a horrific and thoughtless proposal. Please reconsider and stick to your own word. I urge you to refuse this application, to protect the synagogue, this space and the Jewish community.	NO	Public Access website	25-Mar-24

24/00021/FULEIA	WATERMAN	Stanley	A tower of 45 floors would completely engulf the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. As a building such as the one planned would not be permitted to rise next to St Paul's Cathedral, why is Bevis Marks Synagogue not afforded the same preservation? The building would destroy the southward view, an essential part of the setting of the synagogue and important for the intangible qualities it contributes to religious observance. It would block the light fromthe synagogue and the courtyard for much of the day. This would reduce the way in which of the courtyard could be used for religious practice and celebration and would also reduce the already minimal daylight that penetrates into the synagogue even further, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting impractical. Importantly, the development site is within the Creechurch Conservation Area and current planning policy is not to permit tall buildings in Conservation Areas, so the proposal is in direct conflict with the statutory development plan. The current building at 31 Bury Street is only 40 years old and could be refurbished and thereby provide good service for many more years. This planned and inessential demolition simply fritters away the energy embodied in the building. Moreover, the proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. The City Corporation is being insincere here, by claiming to recognize the importance of the synagogue, yet at the same time facilitating this grotesque development.	NO	Public Access website	25-Mar-24
24/00021/FULEIA	Seres	David	This proposed development would be detrimental to the beauty of a historical landmark in the City of London and would seriously affect its light . This buiding is not only the oldest place of worship in the City but is a great tourist attraction bringing many visitors to view its unique architecture.	NO	Public Access website	26-Mar-24
24/00021/FULEIA	Levene	Peter	You will be aware that this is not the first application for a very tall building in the area and when the previous application was turned down, I believe erroneously, that the Planning Committee had decided that such buildings at such a height close to the synagogue should not be permitted to be built. The fact that this synagogue is the oldest, both in the UK and in Europe, and is also a Grade 1 listed building with all its historical and cultural interest should, in my view, in itself be sufficient cause to reject this application. At the time of the Bishopsgate bomb, I formed a group to campaign for funds for the repair of the synagogue following the damage that has been caused. The contributions to this appeal were led with a large and generous donation from the Corporation of London, who fully appreciated the importance and significance of this building. It was thus subsequently repaired, and able to continue as a highly respected place of worship. This new building not only overshadows the synagogue and its courtyard but, more importantly, reduces the already minimal day light that penetrates the synagogue making it even more difficult to conduct worship. Additionally, the development site is within the conservation area. Currently planning policy is not to allow buildings in conservation areas so there is a direct conflict with the statutory development plan. The planning benefits that are outlined in the application do not stand up to close scrutiny. Many are simply features that would be expected in any modern commercial building and do not represent any gain to the community. The considerable outcry which would meet the granting of planning permission would rebound significantly against the reputation of the Corporation of London. This building of the synagogue is not only the oldest synagogue in Europe, as I have mentioned, it is also one of the oldest buildings of religion in the whole of the City of London, predating many of the churches which ar	NO	Public Access website	26-Mar-24
24/00021/FULEIA	Montagu	Sarah	I am truly disappointed that the developers have once again submitted a proposal of an enormous building for this site. As a member of the Jewish community, the importance of this immediate area cannot be overstated; the historic building of Bevis Marks which has been a landmark of this area for centuries will be completely boxed in by this building, preventing light from reaching the windows (and due to the ancient fabric of the building, it is not possible simply to increase the electric light fittings to the interior to compensate) and destroying the setting and atmosphere of the synagogue courtyard. The synagogue is a Grade 1 listed building, and it is of enormous cultural and religious significance, as the oldest synagogue in the country, the flagship synagogue of the Sephardi Jewish community and still in regular This proposal drives a coach and horses through the nature of the Conservation Area within which this site lies, where no tall buildings are supposed to erected, which will affect not just the synagogue but the whole conservation area and the other historic buildings within it. I do not think that the claimed benefits to the community will outweigh the profound damage to this sensitive site and I do not think that the claimed eco benefits can be set against the detriments of demolishing the embodied carbon within the existing building of 31 Bury Street.	NO	Public Access website	26-Mar-24
24/00021/FULEIA	Bower	Patrick	As a user of Bevis Marks synagogue I am upset to see that you are again considering a planning application which would have such a adverse impact on this Grade 1 listed building, the most important Jewish site in the UK. This unique 18th century building is a haven of peace in the midst of a concrete jungle. Would you allow new tower blocks of this kind to overshadow St. Paul's cathedral? The proposals would further diminish this sanctuary, by stealing its light and blotting out its view of the sky. It would be disingenuous in the extreme to create the Creechurch Conservation Area and then to permit this massive overdevelopment next to the synagogue.	NO	Public Access website	26-Mar-24
24/00021/FULEIA	Somekh	Jonathan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Graziani	Lia	This is not good for the Jewish community and those attending Bevis Marks Synagogue.	NO	Public Access	27-Mar-24

24/00021/FULEIA	Holland	Sasha	As a concerned member of the public, I strongly object to the proposed construction of a massive skyscraper near one of the oldest synagogues in London. This iconic synagogue holds immense historical and cultural significance, representing a vital part of London's heritage. The construction of such a towering structure nearby would not only disrupt the aesthetic harmony of the area but also pose potential threats to the synagogue's architectural integrity and religious sanctity. Additionally, the increased congestion, noise pollution, and overshadowing caused by the skyscraper would diminish the tranquility and solemnity of this sacred site. Preserving the character and sanctity of our religious landmarks should be prioritized over the development of imposing commercial structures.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Sorani	Ornella	This is not good for the Jewish congregation who go the Bevis Marks synagogue and also for the area.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Levy	Oliver	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member and regular attendee of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Lebrecht	Elspeth	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Setton	Malcolm	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a regular visitor to this part of The City and am distressed to see this new proposal, especially after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. The application has not changed since the last time it was submitted, is not in keeping with the conservation of a close by Grade-1 listed building, which is now also in a conservation area. The area is already overun with sky scrapers. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral or The Royal Exchange to mention other proected areas in the vicinity. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Ison	Michael	I am writing to express my strong opposition to this new application (24/00021/FULEIA). I have been a member of Bevis Marks' Spanish & Portuguese Jewish community for over 30 years and have held important family occasions there. I am very upset to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted a short distance from British Jewry's 'Cathedral' Synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	lee	corinne	Having gone through the last consultation in respect of the protection of an area surrounding Bevis Marks synagogue, and that consultation resulting is what was thought to be a permanent 'exclusion' zone that would allow the synagogue to finally be assured that its need for natural light was guaranteed, City planning appear to have moved the goalposts to enable the application for another enormous structure to tower over the synagogue to go ahead. Quite frankly, it beggars belief. The historic importance of Bevis Marks to both the City and the Jewish Community should be at the forefront of the decision making, not viewed as an inconvenience as it now seems to be. It brings shame on the Corporation that this should even be considered.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Sopher	Rick	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a member of the Spanish & Portuguese Jewish community which includes Bevis Marks synagogue, I ask: How is the current proposal substantially different from the one you refused refusal two years ago? Is this proposal not in a conservation area? The new application blocks the light of the synagogue, does it not? I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	SUEKE	JOHN	it is utterly distressful and a disgrace that permission has been granted for a building to overshadow and block out light of one of the oldest if not the oldest religious buildings in the area and one of the oldest in the country my protest has nothing to getting the developer to pay any compensation but the callousness of the Planning authority which is shameful and questions their competence to protect the historic and religious sites of the great capital city of our country.	NO	Public Access website	27-Mar-24

24/00021/FULEIA	Cohen	David	Dear Cit of London Council, I am writing to register my vehement objection to application number 24/00021/FULEIA. As a member of the Spanish & Portuguese Jewish community in Bevis Marks, I am deeply troubled by this renewed proposal, especially considering its rejection just two years ago and the recent establishment of the Creechurch Conservation Area. This application, demonstrably similar to the previous one, appears completely insensitive to the preservation needs of a Grade-I listed building. Let me remind you, this very building is not only the most significant Jewish site in the UK, but also resides within a designated conservation zone. The proposed tower, positioned directly south of the synagogue, would be a towering intrusion on the surrounding environment. It would not only obstruct the religiously significant southern sky-view, but also cast a shadow over the synagogue and its courtyard, drastically reducing its already limited natural light. Surely, such a proposal would never be entertained near St Paul's Cathedral. Why then, should it be considered just meters away from the "Cathedral Synagogue" of British Jewry, particularly on its most sensitive southern side? I implore you to decisively reject this application. Sincerely, David	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Gomes da Costa	Marcus	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	RIESE	GINA	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I can't believe the waste of public money in considering these applications made time and again when the public has so strongly objected. Surely it is discriminatory to keep considering these applications over and over again. I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Raquel de Almeida	Maria	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Krygier	Emma	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I experience this as anti semitic and unacceptable. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Mizrahi	Paulette	Would endanger the ability to worship	NO	Public Access	27-Mar-24
24/00021/FULEIA	Levy	Gemma	Important historical site	NO	Public Access	27-Mar-24

24/00021/FULEIA	Green	Charlotte	I am really shocked by this proposal and am writing to say that I very much object to this new application. (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and my family has a long association with it, and my daughter was married there. I am also a member of the Worshipful Company of Spectacle Makers. I am absolutely appalled to see this new proposal in what is a Conservation Area (the Creechurch Conservation Area.) I am all the more appalled, given its refusal two years ago. I would also like to point out that this new application, (pretty much the same as it was last time) is completely out of keeping with the conservation of the Grade 1 Listed Building, our Synagogue, which is the most important Jewish site in the UK. The proposed tower to the immediate South of the Synagogue, would completely dominate it and its courtyard, and it would block out the religiously important southern sky-view. This kind of proposal would never be allowed near St Paul's Cathedral, and should certainly not be allowed just metres from British Jewry's Cathedral Synagogue, particularly along its sensitive southern exposure. Please refuse this application. Charlotte Green	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Leon	Roger	Bevis Marks Synagogue is a treasured landmark, not just in the City of London but as part of our heritage, as a Sephardi Jew and as a British Citizen. Services have been carried out there for centuries and are still taking place there every single day. It is not just a religious landmark, but part of out history as a free and tolerant society. A skyscraper as envisaged by the developer would be a disaster, not just for Bevis Marks Synagogue, but for the area around it.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Leon	Roger	Bevis Marks Synagogue is a treasured landmark, not just in the City of London but as part of our heritage, as a Sephardi Jew and as a British Citizen. Services have been carried out there for centuries and are still taking place there every single day. It is not just a religious landmark, but part of out history as a free and tolerant society. A skyscraper as envisaged by the developer would be a disaster, not just for Bevis Marks Synagogue, but for the area around it. A previous application was turned down, This one should as well.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	gubbay	lucien	I'm writing to express my opposition to this application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am sorry to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This application is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The proposed tower would block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard by dwindling its remaining light. This kind of proposal should certainly not be permitted just metres from British Jewry's Cathedral synagogue. Please refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Zelouf	Diana	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Mocatta	Fiona	Object	NO	Public Access	27-Mar-24
24/00021/FULEIA	Dawood	Cindy	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Yours sincerely Cindy Dawoo	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Marshall	Vivien	I wish to protest against the 45 floor high rise building that is being planned near the Bevis Marks Synagogue. Every time we get a ruling saying that the application has been denied another planning application pops up with just a few tweaks on it. Please could you make sure that the Synagogue is protected from further incursions of light and space. It seems so unnecessary to waste money in fighting planning applications when the money could be used for the local community. With best regards, Vivien Marshall	NO	Public Access website	27-Mar-24
24/00021/FULEIA	salem	phili	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am very concered to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely revised fromthe last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its already compromised remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24

24/00021/FULEIA	Webber	Michael	It is understandably upsetting to see the above revised planning application, despite the previous one having been rejected only circa 2 years ago. As the area around the Bevis Marks Synagogue is now classified as a Conservation Area it is puzzling to understand how there can be a new planning application for a 45 floor tower just 3 less floors than the one refused circa 2 years ago. The proposed new building, as will undoubtedly be readily appreciated by the City of London Corporation, will have a significant, material & detrimental effect on the Bevis Marks Synagogue in terms of blocking out the southern sky view, and overshadowing the synagogue itself and its courtyard, which already has limited light. It should be noted that the Bevis Marks Synagogue is the oldest synagogue in the United Kingdom, in continuous use. The synagogue was built in 1701 & is the only synagogue in Europe which has held regular services continuously for more than 320 years. Bevis Marks Synagogue is therefore an important heritage asset of the UK & I hope that the City of London Corporation will use its best efforts & all the powers at its disposal to appropriately protect & safeguard this important heritage building.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Fellerman	Naomi	The proposed development would completely overshadow Bevis Marks Synagogue a historic and culturally important Grade 1 listed building. I cannot imagine any building of this height being allowed near other important religious centre's such as St Paul's Cathedral. This building if developed would completely overshadow the synagogue and its courtyard for much of the day, virtually rendering the courtyard unusable for rituals and celebrations. The amount of daylight within the synagogue would be further reduced making it difficult for worshippers and it is impossible to add further lighting because of the age and status of the building. This is a conservation area, so why would any development of this type be allowed?	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Adler	Fiona	The proposed 45-storey tower fundamentally disregards the sanctity and significance of the Grade 1 Listed synagogue, a cornerstone of historical and cultural heritage. Its towering presence would not only overshadow the sacred site but also obstruct essential religious observances such as celestial observations integral to rituals. Furthermore, the development contradicts existing planning policies barring tall structures in conservation areas, directly conflicting with statutory guidelines. The City Corporation's facilitation of this project reflects a stark hypocrisy, claiming to value heritage while condoning its desecration. The purported benefits pale against the irreversible harm to the synagogue and its surroundings. Moreover, the demolition of a structurally sound building signifies wastefulness and environmental neglect. This proposal jeopardises the integrity of the entire Conservation Area, betraying the trust of the community and failing to uphold the standards expected of the Corporation of London.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Salem	Freddy	The erection of the proposed building will overshadow Bevis Marks synagogue and will cast a shadow over the entirety of the site putting the synagogue in the shade all year round. Bevis Marks trustees have invested time and money to create a destination viewing of the synagogue and it's artefacts which will be enjoyed by locals and tourists from all over the world. Placing the synagogue in the shade 24/7 is not attractive to visitors.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Garcia	Barry	I must oppose to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This application, hardly changed since the last time it was submitted, it is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. Please stop this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Kaplan	Myles	A 300 year old Grade 1 listed building must be protected from unsympathetic designs and architectural blindness and be afforded the same dignity as St Paul's Cathedral. Is this an example of "Jews Don't Count" once again? Are these tower's even necessary? I would object to the building of any towers in this already densely built-up area.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Brooke	Jennifer	27th March 2024 FAO: Case Officer Anna Tastsoglou I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Green	Katherine	I'm writing to express my strong opposition to this new application (24/00021/FULEIA).I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.I urge you to refuse this application.	NO	Public Access website	27-Mar-24

24/00021/FULEIA	Morgan	Ronnie	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Martin	Maurice	As a regular worshipper at Bevis Marks Synagogue I object as the proposed building would block out the light for our prayers	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Martin	Maurice	As a regular worshipper at Bevis Marks Synagogue I object as the proposed building would block out the light for our prayers	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Ofer	Lina	I vehemently oppose this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community. I know a very similar proposal was refused two years ago. I cannot understand why this proposal has been put forward when it had already rightly so been denied. This application, contradicts the conservation of a Grade-1 listed building. It is also now in a conservation area, and also an incredibly important Jewish site in the UK. The new tower would Overshadow the setting of the synagogue and its courtyard as well as block out the religiously important southern sky-view. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Lina Ofer	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Mendoza	Alan	I am reaching out to vehemently oppose the recent submission of application 24/00021/FULEIA. I find the reintroduction of this proposal deeply troubling, especially considering its previous rejection two years prior and the subsequent designation of the Creechurch Conservation Area, which this application undermines. The proposal, which shows minimal alterations from its prior submission, fails to respect the architectural and historical integrity of the Grade-1 listed Bevis Marks Synagogue, now located within a conservation area. This site holds unparalleled significance for the Jewish community in the UK. The construction of the proposed tower directly to the south of the synagogue would severely impact the site, obscuring the religiously significant view of the southern sky and significantly reducing the natural light reaching the synagogue and its courtyard. It is unthinkable that such a project would be entertained near St Paul's Cathedral. It is equally inconceivable that it should be allowed so close to what could be considered the cathedral synagogue of British Jewry, especially given its vulnerable southern aspect. I strongly advocate for the rejection of this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Zubaida	David	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	nahon	leon	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Garson	Meir	hugely detrimental to listed building,-Bevis Marks-a landmark which should be better protected especially natural light in a building of such importance.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Simon	Ann	For the second time in two years a developer is proposing a 45 storey tower a stone's throw from Britain's Jewish "cathedral" - the 300 year old Grade 1 Listed Bevis Marks synagogue. This tower along the synagogue's southern horizon would destroy the setting of the synagogue, which is so important to traditional ritual and to what makes the synagogue a community hub, and would reduce the synagogue's natural light levels beyond usability. Please refuse this application and any future similar applications. The city should be proud to have this "jewel" without letting it become dwarfed by such a monstrosity.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Dwek	Marie-Anne	Sad that this is even being suggested and the blocking of one of Britain's historic buildings at a time when there is such a rise in antisemitism and London being seen as a no go zone for Jews. It adds to the negative sentiments being felt	NO	Public Access website	27-Mar-24

24/00021/FULEIA	Davidson	David	I strongly oppose this new application. Several generations of my wife's family have worshipped at Bevis Marks Spanish & Portuguese Synagogue. My wife and I have attended services there. I am appalled at this new proposal particularly after the refusal of an almost identical one and the recent adoption of the Creechurch Conservation Area. This new application, a barely revised version of the last one, is not in keeping with the conservation of a Grade 1 Listed Building, which is now also in a Conservation Area and is the most important Jewish site in the UK. The new tower to the Synagogue's immediate south, would dominate the setting of the Synagogue, block out the religiously important southern sky view, and overshadow the Synagogue and its courtyard, dwindling its remaining light. A proposal of this nature would never be considered in the vicinity of St Paul's Cathedral. It should not be permitted just metres from British Jewry's oldest Synagogue, in effect its Cathedral Synagogue. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Arwas	Jenny	I am writing to express my strong opposition to this new application (24/00021/FULEIA) I am a member of the Bevis Marks Spanish and Portuguese Jews' Synagogue and the recent adduction of the Creech conservation area. This new application barely changed is not in keeping with the conservation of a grade one listed building which is now also in a conservation area. The new tower would dominate the setting of the synagogue block out the religiously important southern Skyview and overshadow the synagogue and its courtyard. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should not be permitted meters from the British juries Cathedral synagogue. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Bekhor	Jack	I'm a member of the Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. I urge you to refuse this application.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Zinkin	Peter	The scale of the development at 43 +4 is massively too large for the Bevis Marks synagogue and obviates the point of the conservation area. The southern view will be devastated and the courtyard over shadowed.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Jacobs	Steven	Concerning the new building: It is welcoming to see this project being revised and resubmitted. I wish to see it approved, and I would look forward to the positive effect it will have on the City's skyline. Despite being shorter than the original proposal (20/00848/FULEIA), the updated design still retains a slender silhouette with a progressive taper. Such a form creates an interesting contrast with the broader, rounded shape of the neighbouring 30 St Mary Axe. When seen from vantage points around Tower Bridge, this proposal would appear to the right of the taller tower approved at 100 Leadenhall Street (22/00790/FULEIA). Its comparatively lower height would provide a more gradual transition between the Eastern Cluster and the low-rise buildings beneath it, balancing the view of the cluster as a whole. Concerning Bevis Marks synagogue: It is necessary to mention that the compromises made to the current proposal address concerns from other correspondents regarding the synagogue at Bevis Marks. According to documents submitted in this application, the loss of light to the synagogue is expected to be minimal. The Impact Assessment lists the Cumulative Magnitude of change on Bevis Marks as Very Small. (See ES Volume 2: Heritage, Townscape and Visual Impact Assessment, page 36.) More precisely, the most significant effect caused by this proposal is a mere four-hour reduction in APSH on two of the synagogue's windows. (See Appendix: Daylight, Sunlight, Overshadowing, Light Intrusion and Solar Glare, Annex 4: Daylight and Sunlight Results, page 9. The ASPH of synagogue windows W4/F01 and W5/F01 would reduce from 14 hours to 10, and from 12 hours to 8, respectively. Every other window incurs an ASPH loss lower than this. Indeed, many windows are unaffected.) I anticipate that compensation for this minor loss of daylight, if at all deemed necessary, could form part of this project's Section 106 contributions.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Yentob	Robert	I'm writing to express my strong opposition to this new application (24/00021/FULEIA).I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.I urge you to refuse this application. ''	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Baroness Deech	Ruth	It is disrespectful to the neighbourhood, to an ancient and significant building, Bevis Marks, even to non-Jews, to put this enormous building near it. It is essential to preserve and enhance Bevis Marks.	NO	Public Access website	27-Mar-24
24/00021/FULEIA	Baroukh	Vivien	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a member of Bevis Marks' Spanish & Portuguese Jewish community I am shocked to see this new proposal following its refusal two years ago together with the recent adoption of the Creechurch Conservation Area. The Grade 1 listed building is the oldest synagogue in the UK and of great historical importance. The new application is not significantly different to the last, the building with 45 storeys is contrary to the requirements of being in a conservation area and certainly not in keeping with the conservation of a Grade-1 listed building. This tower located to the synagogue's immediate south, would overpower the synagogue's setting, would have the detrimental effect of overshadowing the synagogue and courtyard thereby reducing the minimal light it already has as well as blocking the religiously important southern sky view. The planning benefits proposed by the developers are certainly not a gain to the community. The refurbishment of the existing building which is still relatively new would be environmentally preferable. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. It is imperative that this application is refused.	NO	Public Access website	28-Mar-24

24/00021/FULEIA	Baroukh	Izzak	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a member of Bevis Marks' Spanish & Portuguese Jewish community I am shocked to see this new proposal following its refusal two years ago together with the recent adoption of the Creechurch Conservation Area. The Grade 1 listed building is the oldest synagogue in the UK and of great historical importance. The new application is not significantly different to the last, the building with 45 storeys is contrary to the requirements of being in a conservation area and certainly not in keeping with the conservation of a Grade-1 listed building. This tower located to the synagogue's immediate south, would overpower the synagogue's setting, would have the detrimental effect of overshadowing the synagogue and courtyard thereby reducing the minimal light it already has as well as blocking the religiously important southern sky view. The planning benefits proposed by the developers are certainly not a gain to the community. The refurbishment of the existing building which is still relatively new would be environmentally preferable. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. It is imperative that this application is refused.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Hougie	Andrew	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish & Portuguese Jewish community which includes Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new 45 storey tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue (a Grade 1 Listed building of enormous historic and cultural significance) and its courtyard, dwindling its remaining light. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Donoghue	Denise	Dear Sir/Madam, I am writing to express my deep concern and outrage regarding the proposed construction of a 45-storey tower adjacent to the Grade 1 Listed synagogue. The Jewish community is deeply invested in preserving our heritage and cultural significance and I urge you to reconsider this project for the following reasons: The synagogue holds immense historic and cultural significance, akin to structures like St Paul's Cathedral. Just as it would be inconceivable to allow such a towering structure next to the cathedral, the synagogue deserves the same level of protection. The proposed tower would not only overshadow the synagogue but also obstruct vital aspects of its religious rituals, such as the view of the moon's passage. These are crucial for the spiritual experience within the synagogue. Despite claims of sustainability and good design, the tower is simply in the wrong location. Its presence would diminish the usability of the synagogue's courtyard for rituals and celebrations and reduce daylight entering the sanctuary, hindering worship. It is disappointing that the City Corporation, despite recognizing the importance of the synagogue, is facilitating this development. As members of the community, we expect higher standards from our local authorities. The developers contend that they offer numerous planning benefits that offset the potential harm to the synagogue. However, upon closer examination, these purported benefits fail to hold up, such as being car-free, showcasing holistic environmental design, and implementing consolidated deliveries, are standard features typically found in modern commercial buildings. Consequently, they do not truly contribute to the community or offset the adverse impacts on the synagogue. I urge you to reconsider the approval of this project and reject it, prioritizing the preservation of our historic landmarks and cultural heritage. Our community's identity and spiritual well-being depend on it. Regards, Denise Donoghue	NO	Public Access website	28-Mar-24
24/00021/FULEIA	shamash	david	The proposed development at 31 Bury Street is a monstrosity and should not be allowed. The proposed building will completely overshadow the Synagogue at Bevis Marks and reduce its daylight to a minumum thus severely impacting a valuable heritage site. The site for the proposed building is within a conservation area, so why would you entertain such a monstrosity? The proposed development at 31 Bury Street is a monstrosity and should not be allowed. The proposed building will completely overshadow the Synagogue at Bevis Marks and reduce its daylight to a minumum thus severely impacting a valuable heritage site. The site for the proposed building is within a conservation area, so why would you entertain such a monstrosity?	NO	Public Access website	28-Mar-24
24/00021/FULEIA	shamash	david	The proposed development at 31 Bury Street is a monstrosity and should not be allowed. The proposed building will completely overshadow the Synagogue at Bevis Marks and reduce its daylight to a minumum thus severely impacting a valuable heritage site. The site for the proposed building is within a conservation area, so why would you entertain such a monstrosity? The proposed development at 31 Bury Street is a monstrosity and should not be allowed. The proposed building will completely overshadow the Synagogue at Bevis Marks and reduce its daylight to a minumum thus severely impacting a valuable heritage site. The site for the proposed building is within a conservation area, so why would you entertain such a monstrosity?	NO	Public Access website	28-Mar-24

24/00021/FULEIA	Gostyn	Antony	I object to the proposed development on the following grounds: 1. The development site is within the Creechurch Conservation Area. The proposed development is in direct conflict with current statutory development plan, which does not allow tall buildings in Conservation Areas. 2. A 45 storey tower would completely overwhelm and overshadow the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance as it is the oldest synagogue in Britain. 3. It would reduce the already low level daylight that penetrates into the synagogue, making it even more difficult to conduct worship. I understand that because of the historic nature of the synagogue, installing additional electric lighting is not feasible. 4. I cannot believe that such a building would be allowed next to St Paul's Cathedral, so why is the synagogue not afforded the same protection? 5. The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. 6. The developers' claim that the planning benefits outweigh the harm to the synagogue. The claimed benefits do not stand up to scrutiny as many are simply features that would be expected in any modern commercial building. They do not represent a gain to the community. 7. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Caddy	Adam	A beautiful proposal, from an established architects with a proven track record of high quality buildings. This will be a welcome addition to the area and the wider skyline, the tone and materials used on the facade seem to be of high quality and the slenderness of the tower will visually have a positive impact here. Concerns over lighting to the surrounding buildings appears to be minimal at worst. I fully support this project and welcome its addition to an ever changing and growing skyline.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Benzecry	Kitty	I strongly oppose the new application (24/00021/FULEIA). I am appalled to see this new proposal following its refusal two years ago and the recent adoption of the Creechurch Conservation Area. This proposal has barely changed since the previous submission and still threatens to overshadow the synagogue and block out its remaining light. This is the most important Jewish site in the UK. The towers surrounding have already vastly reduced the light inside the building. Having had my own wedding in the synagogue last summer, I know it would be a travesty to block out the light to such an important building and would prevent others from being able to enjoy special events in the synagogue. One of my most enjoyable moments of my wedding day was greeting all of our guests as they exited the synagogue and congregated in the sun in the courtyard. This tower would completely overshadow that courtyard, taking away that light to celebrations and festivals which bring our community such enjoyment. It would also block out much more of the light inside the building, making it impossible to read prayer books and preventing worship. We are a multicultural society and pride ourselves on it, yet we don't afford the same protections to historic religious buildings outside of Christianity that we do to Christian buildings in this country. St Paul's Cathedral's light and sight lines are protected, including from distances as far as Alexandra Palace, Kenwood House and Richmond Park. If we protect St Paul's Cathedral to that extent, then it would be a travesty to allow this tower to be built on the doorstep of the British Jewry's Cathedral Synagogue. The drawbacks of this proposal far outweigh any proposed benefits that the developer claims and would be extremely harmful to both the synagogue and the community. I urge you to refuse this application.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Alliance	Homa	To raise a building of such magnitude in the vicinity of an old building dating to 1701, is inconsiderate as the certain damages to Bevis Marks synagogue will be unimaginable and a big shame, historically. Therefore I request that the authorities will turn down the permission for a high rise office building in this location. Many thanks for your consideration.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Morgan	Cyril	This is for you to kindly consider my strong objection to the new application (24/00021/FULEIA) re this site. As a long-standing member of Bevis Marks' Spanish & Portuguese Jewish community I was shocked to note that yet another proposal has been made, especially considering this was already refused only 2 years ago. There has also been the recent adoption of the Creechurch Conservation Area. This new application is almost identical to the previous one. It is not in line with the conservation expected of a Grade-1 listed building, which is now also in a conservation area, and is the most important and historic Jewish site in the UK. The proposed new tower to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. A proposal such as this would never be entertained anywhere near St Paul's Cathedral. On no account should such a proposed building be considered only yards from the synagogue which represents the equivalent of British Jewry's Cathedral synagogue. Kindly refuse this application in no uncertain terms so the developers do not return again wasting both your time and that of the local community. Thank you.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Martin	Nicola	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). My husband's family have been members of Bevis Marks since it was built in 1702. Our family are still members of Bevis Marks' Spanish & Portuguese Jewish community and I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	28-Mar-24
24/00021/FULEIA	Moses	Selina	I object. Do we really have to go through this again? Bevis Marks is an irreplaceable historic building and very important to the Jewish community. This wouldn't be done to an important cathedral or a mosque so why are Jewish communities being treated this way? We feel as if we do not get the slightest bit or respect or courtesy for things that are important to us. Stop trying to destroy even the light around the synagogue, especially for the soulless generic building you want to erect. London's history is being eroded and if that doesn't concern you, try and think about having some respect for minorities, especially the oldest minority in England. Jews have been here since 1099. We shouldn't have to keep fighting to preserve what is important to us.	NO	Public Access website	28-Mar-24

24/00021/FULEIA	Ish-Horowicz MBE	Judith	I was shocked to hear that you are again considering a planning application for a development that would impact so negatively on Bevis Marks Synagogue, a site of immense historic Jewish significance and indeed British significance in its place in the history of British Jewry. Just this week, I had an enquiry from a visitor to London asking me to recommend sites of Jewish interest to see and Bevis Marks Synagogue was the top of the list. As a user of the synagogue, I appreciate the way its natural light enhances the spiritual elements of the services. A 45-storey tower block would totally overwhelm it and block out the the sky. Surely the purpose of creating the Creechurch Conservation Area was to protect and enhance buildings of such cultural and historic importance? I hope we are not living in such a dystopian society that the very organisation that is entrusted to protect Bevis Marks would undermine and devalue this historic Grade 1 listed landmark.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	ORENSTEIN	Sara	I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Salem	Muriel	It's a unique historical synagogue oldest in UK still functioning had lottery money to open as museum and educational center will be ruined if deprived of natural light . What a shame for the community, the tourists and the City of London . Planners should be responsable not to deface such precious jewels of building full of history and spiritually meaningful. We must save it at all cost !! How else would we learn anything if we stiffle and try to bury in darkness such beacon's of past society . Also the fact that public money was spent to save it and enhance it . A	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Khalastchi	Tony	I strongly object to this new application which is barely any different to the one submitted and refused 2 years ago-I have been a member of the Spanish and Portuguese Jewish community for over 40 years to which Bevis mark is an integral part-a45 storey tower would overpower the synagogue and there is no way such a tower would be allowed next to st .Paul's -it will definitely affect the light and lastly it is in a conservation area where no tall buildings are meant to be built in summary I strongly urge you to refuse this application.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Martin	Gusti	The proposed building would block out the light to our Synagogue in Bevis Marks, which would interrupt our prayers	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Mocatta	Edward Charles	I am objecting to this application on the same basis as I objected to the previous planning application for a 48 story tower on the site. It will completely overshadow and block natural light from the Bevis Marks and agog which was constructed in 1701 and have a very damaging effect on this wonderful historic building and its surroundings. This you previously created the conservation area around this so I do not understand why you are changing your stance and even permitting an application for a 46 story building to be made. Quite apart from that, I feel there are more than enough tall buildings in the area, which I know is favoured because of protective sightlines et cetera. However the vast number of people working in these huge buildings, assuming they all work from their offices, must far exceed the ability of the existing, and basically mediaeval, redneck network in the area to cope with them at peak times. Also one has to ask given the oversupply of office space in the city and more generally following the increase in working from home, whether another 46 story office block is needed. Quite apart from that, there's the application to build a 45 story office block above Liverpool Street station which is not very far away. I feel the whole area is over dominated by very tall buildings and that this application should be refused	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Ansell Brauner	G. E.	I feel distressed that construction of an inappropriate tower is again being proposed, overshadowing Bevis Marks Synagogue, a low, historical monument of international note and a Grade 1 listed building, which should be protected under law. Moreover, in daytime, the interior main hall of Bevis Marks where services are conducted is unique in atmosphere, being lit entirely by natural light and this would no longer be possible if all the light is blocked by a high-rise building. It is candle-lit at night. Religious services held there are renowned for a special, ethereal quality afforded by this setting. There is no call or ecological justification to bring more office space and business premises into this area, creating dense land use: furthermore, landmark buildings and access to them should be preserved in their aesthetic surroundings as far as possible. The area is already car-free, to create massive modern buildings would damage it beyond restoration, rather than provide services or enhance it. To claim this as progress is disingenuous - it is pure destruction.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Jackson	Judith	This is a very serious application - only a few storeys lower than the previously refused permission. It's about Bevis Marks synagogue, a landmark, an in-use place of worship - the oldest synagogue in the United Kingdom. This proposed building will do immense harm to the light going into the synagogue and courtyard and should never be allowed. Several recent applications have been refused. I wonder why this one is even being considered, given all the arguments put forward to protect this important site in the City of London. There will be hundreds of comments backing my view. I am a member of a sister synagogue in Westminster. We were married at Bevis Marks and the continuation of synagogue services is absolutely vital. Please, please consider the views of those who will be so badly affected, should the planning permission be granted.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Engelbert	Ronald	It seems to me that the City Corporation is acting in an extraordinarily underhand manner. The proposed development went through the planning process in 2022 and permission was refused, primarily, I understand, because of the unacceptable impact on the synagogue. As a result of the work of the Bevis Marks community, the area surrounding the synagogue is now designated as a Conservation Area where tall buildings are banned. However, the City Corporation is proposing to scrap the ban on tall buildings in Conservation Areas. This is outrageous. The Corporation can't help it's developer cronies by playing by the existing rules, so why not change the rules. In what way would the development negatively impact the synagogue? The proposed 45 storey tower would be out of all proportion to the synagogue. The tower would block the southern sky view, an important contributor to religious ritual. It would also overshadow for much of the day the courtyard, which is used for rituals and celebrations.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Fenton	Susan	Light obstruction Noise during construction Change in local architecture	NO	Public Access website	29-Mar-24

24/00021/FULEIA	Salem	Melody	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Setton	Raphael	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). In 2020, a 48 storey office building was proposed just 25 metres away at 31 Bury Street. After a worldwide campaign which generated more objections that the City Corporation has ever experienced before, the Corporation refused permission in 2022, primarily because of the unacceptable impact on the synagogue. The developers are audaciously trying again. Tireless work by the Synagogue community has led to the area now being designated as a Conservation Area. However, the City Corporation has given with one hand and is taking away with the other - it is proposing to scrap the ban on tall buildings in Conservation Areas and indications are that the leadership is now supportive of the proposed building. Why has the Corporation bowed to these wealthy developers?? I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Hernandez	Maria	The new building certainly looks more presentable than some other towers. It is neither too tall nor too wide, and it will help to fix the City's shortage of offices and cultural spaces. The synagogue at Bevis Marks is already surrounded by taller buildings, including the nearby Gherkin, so I doubt this one will make much difference to the sunlight inside.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Sopher	Rachel	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. It is only fair as a house of worship we see the light and wonder if a proposal in front a prominent mosque or church would even have reached this stage Thank you for your kind consideration	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Gold	A	What a beautiful building you have chosen to tear down. The first, oldest Synagogue in London. In an area steeped in history. We should be fighting to preserve this building. It has traces of European history too. I refuse to understand your decision. The Sephardi community only make up about 20% of the entire community, a minority. There are far fewer Sephardi buildings and synagogues in London than Ashkenazi ones. The Ashkenazi community	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Gold	A	What a beautiful building you have chosen to tear down. The first, oldest Synagogue in London. In an area steeped in history. We should be fighting to preserve this building. It has traces of European history too dating back to fleeing persecution connected to the Inquisition. I refuse to understand your decision. The Sephardi community only make up about 20% of the entire community, a minority. There are far fewer Sephardi buildings and synagogues in London than Ashkenazi ones. The Ashkenazi community makes up 80% of the Jewish population. We have a right to complain if we feel we are being threatened, or our history eliminated. This cannot go unnoticed. The Sephardi Jewish community connected to this Synagogue is 350 years old. Older than some of the more modern established Ashkenazi communities here. Please consult with an expert before you take any decision to do this. If people from around the world want to visit a building this is their main option. Without it there is nothing to replace it in the city! It is located in the heart of the city and represents all of city life. Do not suggest that the Jewish community does not belong here in the city centre. France has a higher percentage of Sephardi Jews and we have many French Sephardis who have loved visiting this Synagogue when they are in London. In France I visited a historic synagogue which the authorities have recognised as an important piece of history having survived WW2 and the French have refused to just pull it down. Time to become more aware of this as a cultural reference.	NO	Public Access website	29-Mar-24
24/00021/FULEIA	Timan	Ezra	Dear Sirsl am writing to express my strong opposition to this new application (24/00021/FULEIA).I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.I urge you to refuse this application. RegardsEzra Timan	NO	Public Access website	30-Mar-24
24/00021/FULEIA	Timan	Ruth	Dear Sirsl am writing to express my strong opposition to this new application (24/00021/FULEIA).I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.I urge you to refuse this application. RegardsRuth Timan	NO	Public Access website	30-Mar-24
24/00021/FULEIA	Gubbay	Joshua	Object based on the impact it will have on nearby historical buildings.	NO	Public Access	30-Mar-24

24/00021/FULEIA	schmool	barak	once again it seems that my beloved synagogue, already cornered by high rise neighbours, is under threat of having its remaining natural light impacted upon. I note that the corporation's previous promises of protection amount to little, and I am confident that a church of equal historic importance and grade 1 listing would not be treated in this manner. I reject the concessions made to limit a new neighbouring tower to a mere 45 rather than 48 storeys - this is a conservation area and only if you ignore you own rules would this be permissible. Why have rules if they mean so little? Would you bend them in favour of the Jewish community instead? I somehow doubt that. All of the suggested benefits to the development are either not benefits or irrelevant to the Synagogue. The development will clearly only have a negative impact.	NO	Public Access website	01-Apr-24
24/00021/FULEIA	BAYLIN	RONALD	The building you intend will place this still beautiful, still functioning historic synagogue into an extremely negative space. Please reconsider.	NO	Public Access website	01-Apr-24
24/00021/FULEIA	KRAMER	STEPHEN	Whilst I am not a neighbour I was a judge at the Central Criminal Court for 13 years and attend servies at Bevis Marks from time to time, especially Kol Nidrei (Eve of Day for Atonement). I am also a Past Master of the Worshipful Company of Bakers and my Election Service took place at Bevis Marks synagogue. It has always been an integral part of the experience to start a service in daylight and see the evening approaching in candlelight. That daylight would be jeopardised if this applicaton is granted. However, my objection is not based on sentiment but on the reality of what would happen if it is allowed. It must be remembered at all times that Bevis Marks is a Grade 1 listed building. If ithis proposal is allowed, the 40 plus storey tower would overwhelm the synagogue, destroy the southern sky view and blot out much of the daylight presently enjoyed by the synagogue and courtyard. The site is within the Creechurch Conservation area and the proposal itself is contrary to current planning policy not to allow tall buildings such as the proposed one in such areas. If there is a need for yet another tall building in the City in the foreseeable future, which - looking at the number of empty buildings already there - I very much doubt, this proposed building is totally inappropriate for this site and the surrounding buildings. Accordingly I strongly oppose this application.	NO	Public Access website	01-Apr-24
24/00021/FULEIA	Seres	Jennye	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Lauderdale Road Spanish & Portuguese Jewish community and am extremely upset to see yet another new proposal, which would be if passed very damaging to Bevis Marks Synagogue, particularly after yet another refusal two years ago, and the recent adoption of the Creechurch Conservation Area. It is not fair to keep putting stress on the community to write in opposition to these continued unsuitable applications. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.	NO	Public Access website	01-Apr-24
24/00021/FULEIA	Cohen	Charles	This is the oldest Synagogue in the country and is a Grade 1 Listed building of enormous historic and cultural significance. It has been used continually by the Sephardi community since its founding in 1701 This makes it just four years younger than St Paul's cathedral, where similar developments have been blocked in the past, so why is the synagogue not afforded the same protection? There is significant office development elsewhere in the City, and there is no evidence of a shortage of office space, given current vacancy rates	NO	Public Access website	01-Apr-24
24/00021/FULEIA	Montefiore	Victor	I am a Freeman of the City and I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK; and one of the most important in Europe. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. How will congregants participate and engage with religious services if the light is so dark that they cannot read and follow services? I insist that you refuse this application.	NO	Public Access website	01-Apr-24
24/00021/FULEIA	Sandler	Patricia	I'm writing to voice my firm opposition against the new application (24/00021/FULEIA). The intended development site lies within the recently designated Creechurch Conservation Area. Given that existing planning policies forbid tall buildings in Conservation Areas, it is troubling to learn that the esteemed City Corporation is giving consideration to a planning application for a 45-story tower, merely three stories less than a proposal that was turned down roughly two years ago. It appears quite disingenuous for the City Corporation to contemplate this proposed development while also enforcing a ban on tall structures in Conservation Areas. It's worth noting the equal historical and religious importance of St Paul's Cathedral and the Bevis Marks Synagogue. It would be unthinkable for such a development to be considered, let alone proposed, near St Paul's Cathedral. The fact that this new application is being considered at all highlights a seeming disregard by the City Corporation for Jewish places of worship.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	OBERMAN	ISABEL	This new proposed development will totally overshadow Bevis Marks Synagogue. This is a historic heritage building mainly lit by candlelight. The height of the proposed development will cut all daylight apart from being far too high in respect to surrounding buildings.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Morgenthau	Allan	I strongly object to the plans which will have a disastrous impact on the neighbouring historic building and is not in keeping with surroundings	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Morris	Sarah-Lou	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	02-Apr-24

24/00021/FULEIA	Jackson Levy	Caroline	Bevis Marks synagogue- a landmark for British and International Jewry is again being treated as an 'inconvenience' by developers intent on pursuing their building plans with a relentlessness that feels like bullying to those of us who are members of our beloved and precious synagogue. I urge the members of the planning authority to once again understand, consider and respect the significance of this building and the sanctity it provides - and to deny permission for a new 43 floor adjacent building - instead to protect and support this precious grade 1 listed synagogue and the community it serves.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Epstein	Thelma	This synagogue is the oldest continuously used synagogue in the UK dating from 1701. As such it has enormous cultural meaning and importance to the Jewish community. Though it is located in the City of London it has had many tall buildings erected around it which has meant that it is totally dwarfed save for the southern sky view which means that the sky can be seen from the courtyard with a view of the moon and stars on a clear night. Despite numerous previous applications to erect tall buildings that would dwarf the synagogue a ban was put on these applications, as the area around the synagogue was designated as being in a Conservation area. The Council is now proposing to scrap this designation and consequently an application has been made to erect a 45 storey building which would completely dwarf the synagogue, which is a Grade 1 listed building, and reduce the minimal light that enters the synagogue making it more difficult for prayer. The historical nature of the synagogue precludes adding additional light inside it. The height of the building would also lessen the usability of the courtyard for rituals and celebrations as it would be further overshadowed. The importance of this synagogue is equivalent to the that of St Paul's Cathedral and I am sure that no such a skyscraper would be given permission to be built next to St Paul's. This synagogue is much visited by visitors to the UK and its setting, despite the current buildings around it, make it much appreciated. The benefits that the developers mention would be expected from any new tall building and thus of no matter in this case as a particular benefit. The downside of the development far outweighs any of the proposed benefits. In short, it would be a disaster.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Banks	Adrienne	This proposed building work is a threat to an extremely important historical building, Bevis Marks synagogue, which has seen continuous worship by the Jewish community for 350 years. Its significance cannot be undervalued as a symbol of the City's openness and tolerant values. It should be protected and cherished Please do not allow this project to go ahead.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Kemp	Malcolm	This synagogue is the oldest continuously used synagogue in the UK dating from 1701. As such it has enormous cultural meaning and importance to the Jewish community. Though it is located in the City of London it has had many tall buildings erected around it which has meant that it is totally dwarfed save for the southern sky view which means that the sky can be seen from the courtyard with a view of the moon and stars on a clear night. Despite numerous previous applications to erect tall buildings that would dwarf the synagogue a ban was put on these applications, as the area around the synagogue was designated as being in a Conservation area. The Council is now proposing to scrap this designation and consequently an application has been made to erect a 45 storey building which would completely dwarf the synagogue, which is a Grade 1 listed building, and reduce the minimal light that enters the synagogue making it more difficult for prayer. The historical nature of the synagogue precludes adding additional light inside it. The height of the building would also lessen the usability of the courtyard for rituals and celebrations as it would be further overshadowed. The importance of this synagogue is equivalent to the that of St Paul's Cathedral and I am sure that no such a skyscraper would be given permission to be built next to St Paul's. This synagogue is much visited by visitors to the UK and its setting, despite the current buildings around it, make it much appreciated. The benefits that the developers mention would be expected from any new tall building and thus of no matter in this case as a particular benefit. The downside of the development far outweighs any of the proposed benefits. In short, it would be a disaster.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Obadiah	Sophie	Dear City of London application team, Please would you consider your decision to allow the tower block build to go ahead. What a great shame to block out yet more light and sky from the original buildings- Grade listed I might add. Please would you take the view of King Charles and keep the tower block away. The City will lose its special appeal and result in a city just like any other in the world. I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Many thanks for reading this and reconsidering. Yours faithfully, Sophie Obadiah	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Sackman	Simon	I strongly object to this application.I have been a member of the Spanish & Portuguese Jewish community for over 40 years. I regularly attend services at Bevis Marks Synagogue and I and two of my daughters were married there. I am very familiar with this part of the City, as my office for over 30 years was in Camomile Street. Bevis Marks Synagogue is the jewel in the crown of this country's Jewish community and one of which the City of London should be proud and anxious to preserve. The current application has barely changed from the developer's original application in 2022, to which I also objected. In the context of the setting of the synagogue, the difference between a 45-storey tower and the previous 48-storey tower is negligible. The proposed development, like the original proposal, is totally at odds with the conservation of a Grade 1 listed building, which is now also in the Creechurch Conservation Area established by the City Corporation only a few months ago. The new tower would overshadow the synagogue and its courtyard and crucially reduce the natural light illuminating the synagogue's interior, materially impairing the environment in which religious services take place and have done so continuously since 1701. Further, the incorporation of 4 basement levels in the new building would risk damaging the very structure of the 323-year old synagogue.The City Corporation rightly rejected the 2022 application and should do the same again now; there are more than enough tall buildings in the area. What is the point of creating a conservation area and then allowing irreparable harm to one of the few remaining heritage buildings in that area? Such a proposal would never be entertained near St. Paul's Cathedral and should not be permitted just yards from the most important Jewish building in Britain.I urge the City Corporation to refuse this application and make clear that no application on anything like the proposed scale will ever be entertained. I obje	NO	Public Access website	02-Apr-24

24/00021/FULEIA	Seruya	Donna	I strongly object to this application. I have been a member of the Spanish & Portuguese Jewish community for over 40 years. I regularly attend services at Bevis Marks Synagogue and I and two of my daughters were married there. I am very familiar with this part of the City, as I worked nearby for over 30 years. Bevis Marks Synagogue is the most important Jewish building in Britain and one of which the City of London should be proud and anxious to preserve. The current application has barely changed from that submitted in 2022, to which I also objected. In the context of the setting of the synagogue the difference between the two proposals - a 45-storey tower versus one of 48 storeys - is negligible. The proposed development, like the original proposal, is totally at odds with the conservation of a Grade 1 listed building, especially now that the synagogue is in the Creechurch Conservation Area established by the City Corporation only a few months ago. The new tower would overshadow the synagogue and its courtyard and crucially reduce the natural light illuminating the synagogue's interior, materially impairing the environment in which religious services take place. Furthermore, the incorporation of 4 basement levels in the new building would risk damaging the very structure of the 323-year old synagogue. The City Corporation rightly rejected the 2022 application and should do the same again now. There are already more than enough undistinguished skyscrapers in the vicinity. What is the point of creating a conservation area and then allowing the setting and functioning of one of the heritage buildings that has justified that conservation status being severely compromised? I therefore urge the City Corporation to refuse this application and make clear to the developer that no application on anything like the proposed scale will ever be entertained.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Jacobs	Steven	Concerning the new building: It is welcoming to see this project being revised and resubmitted. I wish to see it approved, and I would look forward to the positive effect it will have on the City's skyline. Despite being shorter than the original proposal (20/00848/FULEIA), the updated design still retains a slender silhouette with a progressive taper. Such a form creates an interesting contrast with the broader, rounded shape of the neighbouring 30 St Mary Axe. When seen from vantage points around Tower Bridge, this proposal would appear to the right of the taller tower approved at 100 Leadenhall Street (22/00790/FULEIA). Its comparatively lower height would provide a more gradual transition between the Eastern Cluster and the low-rise buildings beneath it, balancing the view of the cluster as a whole. Concerning Bevis Marks synagogue: It is necessary to mention that the compromises made to the current proposal address concerns from other correspondents regarding the synagogue at Bevis Marks. According to documents submitted in this application, the loss of light to the synagogue is expected to be minimal. The Impact Assessment lists the Cumulative Magnitude of change on Bevis Marks as Very Small. (See ES Volume 2: Heritage, Townscape and Visual Impact Assessment, page 36.) More precisely, the most significant effect caused by this proposal is a mere four-hour reduction in APSH on two of the synagogue's windows. (See Appendix: Daylight, Sunlight, Overshadowing, Light Intrusion and Solar Glare, Annex 4: Daylight and Sunlight Results, page 9. The ASPH of synagogue windows W4/F01 and W5/F01 would reduce from 14 hours to 10, and from 12 hours to 8, respectively. Every other window incurs an ASPH loss lower than this. Indeed, many windows are unaffected.) I anticipate that compensation for this minor loss of daylight, if at all deemed necessary, could form part of this project's Section 106 contributions.	NO	Public Access website	02-Apr-24
24/00021/FULEIA	Black	Robert	Scheme disregards the local surroundings and will substantially block light getting into the surrounding buildings.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Samson	Alan	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Mount	Amanda	As a new member of Bevis Marks Synagogue, I am appalled that this planning application has been brought forward again. It is incredibly similar to the application that was previously rejected and will do untold harm to the synagogue and local heritage. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. I urge that this building be rejected as it was before.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Solomons	Lesley	My family have been members of Bevis Marks Synagogue for well over a hundred years. Generations of my family have married there and it is the place that we go to pray, celebrate, mourn and just be together. To think that this irreplaceable building will be put at risk by a tower block that is of questionable need is an abrogation of the City's duties. The sheer size of the building and the fact that it is being proposed in a conservation area are clear indicators that this building should not be given permission to proceed. The impact on the day to day working of Synagogue as well as other heritage assets will be catastrophic and this building must not proceed.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Taylor	Nick	London is both a city of change and historical juxtaposition. Rather than be detrimental to the surrounding environment, the proposal would open up the area, add new amenities, and increase office space (a market that is recovering post-pandemic). I don't see the evidence for material damage to any historic structures, thus it would be erroneous to reject the application.	NO	Public Access website	03-Apr-24

24/00021/FULEIA	Alexander	Victoria	It is impossible to underestimate the importance and relevance of Bevis Marks Synagogue. Not only is it an extremely important religious building for the Spanish and Portuguese Jewish community in London. This proposal should be rejected on many grounds, including taking the natural light of an historical building. This is the same way that any similar proposal would be rejected near St Paul's cathedral. This synagogue was built in 1699, following Jews being readmitted to London in 1657 and has been a symbol of London's tolerance and embrace of other cultures and religions for the following 325 years. To disrespect this building and its history with tower blocks adjacent to it is to desecrate everything that Londoners as well as British Jews have stood for over centuries of peaceful living. At this time this message is needed more than ever and should not be ignored. I urge you to reject this proposal.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Alexander	Victoria	It is impossible to underestimate the importance and relevance of Bevis Marks Synagogue. Not only is it an extremely important religious building for the Spanish and Portuguese Jewish community in London. This synagogue was built in 1699, following Jews being readmitted to London in 1657 and has been a symbol of London's tolerance and embrace of other cultures and religions for the following 325 years. To disrespect this building and its history with tower blocks adjacent to it is to desecrate everything that Londoners as well as British Jews have stood for over centuries of peaceful living. At this time this message is needed more than ever and should not be ignored. I urge you to reject this proposal.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Sanders	Anna	I strongly object to the proposal of a 45 storey tower at 31 Bury St. As a member of Bevis Marks' Spanish and Portuguese Jewish community I believe that this important and unique place of Jewish heritage and history in the UK should be protected, and such a huge tower should not be built in such close proximity. The courtyard entrance to the synagogue is already very enclosed with limited light and such a tower would reduce the light coming to the courtyard even further. The tower will be located to the south and this is of particular significance as the southern sky has importance in various religious rituals. The developers seem to have taken no notice of the adoption of the Creechurch Conservation Area and I truly hope that a scheme of such magnitude will not be accepted in such a sensitive location. I urge to reject these proposals. Many thanks for your consideration.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Sebag-Montefiore	Victoria	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Elfassi	Angie	The synagogue is a historical grade 1 building. The intended block of over 40 floors will take away the beauty of this building built in 1701 and is part of the city like any other building from over 300 years ago.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Cohen	Michael	This is a religious place of worship and of great importance to the community . Would such a building be proposed to be built adjacent to St Paul's Cathedral .	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Motz	Martin	As a former pupil of City of London School I am highly concerned about this proposal. Bevis Marks Synagogue is a unique Type 1 listed building. Furthermore it is the spiritual home for many Jewish people who live or work in the City. My most joyous experience was at the wedding of friends. The candle lit ceremony combined happiness, hope and continuity, which is so precious. The the proposed building - that one might call a carbuncle - would be overbearing presence. Looming over this precious place it would literally cast a dark shadow over this wonderful community that is steeped in history.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Taylor	Diane	Absolutely appalling that an extremely high building could be put next to a Synagogue which is a listed building. It is a beautiful building which relies on natural light which would be compromised by your proposal. Also its foundations could be affected by the new building and it's foundations. I can't think of a worse type of building to put next to a place of worship. Bevis Marks is very old building and would be greatly affected by the proposed building. I strongly suggest that this building should not be built at the site. It is far too high and too many floors underground. I am sure that this and other buildings would be greatly compromised by the proposed construction. Please do not allow this to go ahead.	NO	Public Access website	03-Apr-24
24/00021/FULEIA	Spencer	Antony	Why are you thinking of changing your decision to allow a tall building next to Bevis Marks synagogue . SHAME ON YOU FOR CONSIDERING TO CHANGE YOUR DECISION , In my opinion you need to preserve this conservation area . Tall buildings are not compatible in this location ,if you wish preserve working of the synagogue and its setting which would be completely changed by the tall building proposed . Please do not grant permission	NO	Public Access website	04-Apr-24
24/00021/FULEIA	Crew	Steve	Preferred the previous proposal and thoroughly support this one. Hoping that ambition and progress can overcome all this political single interest on-line proding and posturing. "The horse has bolted people, look up and around you, The City is right in front of you." No one is tarmacing over anything, this part of London is unique because you can turn a corner and find wonderful old buildings slap bang against modern architecture.	NO	Public Access website	04-Apr-24
24/00021/FULEIA	Solomons	Adrian	As a long standing member of Bevis Marks Synagogue, I am deeply dismayed by this current proposal, especially following its rejection two years ago and the recent establishment of the Creechurch Conservation Area. The barely changed nature of this new application, compared to its previous submission, does not align with the conservation efforts for a Grade-1 listed building, now situated within a conservation area, and recognised as the most significant Jewish site in the UK. The proposed tower, positioned immediately south of the synagogue, would significantly encroach upon the protected ambiance of the synagogue, obstruct the crucial southern sky-view integral to religious observance, and cast an overpowering shadow over the synagogue and its courtyard, further diminishing its natural light. Such a proposal would never be entertained in the vicinity of St Paul's Cathedral and certainly should not be permitted mere metres from the Cathedral synagogue of British Jewry, especially given its sensitive southern orientation. I implore you to reject this application.	NO	Public Access website	04-Apr-24
24/00021/FULEIA	Easey	Reuben	Please do not succumb yet again to a stubborn minority, as happens time and again in this country; the building should clearly be approved. There are plenty of tall buildings in the City already, and they have improved the place no end - it's far less drab and grey these days. Moreover, the blend of old and new is part of its charm - there are plenty of churches and other religious buildings nearby which are abutted by tall buildings and are no worse for it.	NO	Public Access website	04-Apr-24

24/00021/FULEIA	Zarach	Stephanie	I find it hard to understand the difference between this planning request and the previous one for this site. The Bevis Marks synagogue is well over 300 years old and is a mark of the culture of the City and its antecedents. Your preoccupation with faceless towers willl blight this synagogue, totally destroying its access to the sky in daytime or at night and therefore affecting the various ritual services that are so important to it. Moreover, Bevis Marks is in a designated Conservation Area: what is the point of such an area if it isn't to preserve the features within it? Security has never been more important in this country as it is now. This building will overlook the synagogue and therefore destroy the privacy of those who pray in it: you will create opportunities for terrorists. This is undoutedly a matter of the City putting money above the heritage it is supposed to protect. You wouldn't consider allowing an edifice like this to overshadow St Paul's Cathedral: Bevis Marks, built in 1701, is nine years older than Wren's St Paul's. The City is founded on history. It is part of its DNA. Why do you want to destroy this at every opportunity?	NO	Public Access website	04-Apr-24
24/00021/FULEIA	Ainslie	John	I strongly object to this proposal on the following grounds: Harm to the nationally important Grade 1 listed Bevis Marks synagogue by virtue of the overbearing and overshadowing impact on the courtyard, which will give rise to severe adverse effect on the setting of the synagogue, impacting an essential component of the synagogue complex, and thereby substantially eroding the cultural heritage significance of the listed building itself; Substantial harm to, and loss of significance of, the Creechbank conservation area; Contrary to Local Plan policy DM12.2 as the proposal does not preserve or enhance the character and appearance of the conservation area, by virtue of the size, scale, height, massing, appearance and design of the proposal; Severe adverse impact on the amenity and use of a culturally and religiously significant building viz the synagogue, the listing details of which make clear the cultural and religious significance of this particular synagogue, in a national as well as local context; Threat to the ongoing viability of the synagogue by virtue of the destructive impact on the setting of the building, but more importantly to the essential and vitally important courtyard which is intrinsic to the religious function of the building. In addition I believe the EIA is legally deficient in the absence of a detailed, balanced and considered assessment of the proposal in terms of its impact on the conservation area; and on the Grade 1 listed synagogue particularly in terms of the impact on the courtyard which is intrinsic to the overall heritage value and cultural significance of the synagogue; and on the severe impact on the amenity and function of the synagogue as a cultural and religious building in current use. Finally, heritage is not just about bricks and mortar buildings, it is about the historic and cultural resonances of a building and the cultural function which a building currently serves, and the benefit	NO	Public Access website	05-Apr-24
24/00021/FULEIA	Tricot	Anthony	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I have been a member as well as a trustee of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	05-Apr-24
24/00021/FULEIA	Ben-Nathan	Colin	I am strongly opposed to this new application (24/00021/FULEIA). I'm a member of the Spanish & Portuguese Jewish Community and am very disappointed to see this new proposal, particularly after (i) the refusal of a similar proposal two years ago, and (ii) the recent adoption of the Creechurch Conservation Area (the CCA). The current application, virtually unchanged bare since the previous one, is not in keeping with the conservation of a Grade-1 listed building, a building which is now also in the CCA and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. My understanding is that the Council instituted the CCA, which would normally prevent high rise buildings being constructed, and then relaxed the rules to allow for such construction. This seems extraordinary to me and I am puzzled as to what has prompted this change in approach. In any event in this case proceeding with the development would be very much to the detriment of a historic and beautiful building which has been the flagship place of worship for the Jewish Community for over 300 years.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Kay	Deborah	The extent/height of this building will block out the natural light from the listed heritage building Bevis Marks which will substantially negatively impact the experience of visitors and synagogue users.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Sawdaye	Michael	I am writing to formally object to the proposed construction of a tower that would cast a shadow over the courtyard of the synagogue. On a personal note, I held my wedding ceremony in this very courtyard on a beautiful sunny August day. The abundant natural light contributed significantly to the special memories created for myself, my family, and our friends. A lasting sense of joy and light is associated with this space. The proposed tower development, by blocking sunlight from reaching the courtyard, would significantly alter and potentially diminish the character of this important space. The loss of natural light would be a real detriment to the functionality and beauty of the courtyard, a place that holds significance for countless individuals and serves as a venue for various events. Therefore, I strongly object to the granting of permission for this development. The potential negative impact on the synagogue's courtyard, a space steeped in light and cherished memories, outweighs any perceived benefits of the proposed tower.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Raphael	Jeremy	I am deeply concerned over the impact of light and the architectural mismatch with the Grade 1 listed Bevis Marks Synagogue. Like others have said, planning permission would not be granted for such a building next to St Paul's Cathedral.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Radus	Marc	For all the reasons given to you regarding the detrimental impact to the historical treasure - Bevis Marks Synagogue.	NO	Public Access website	07-Apr-24

24/00021/FULEIA	Leifer	Janet	Bevis Marks is very important as a historical building and for over 400 years has been a place of worship for the Jewish community. Jews still worship there. For worshippers and all visitors it is essential that it has natural light in the courtyard and it should not be overshadowed by a high tower block. London should be a city for all its inhabitants and should respect its Jewish heritage .	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Morris	Joshua	Bevis Marks Synagogue is a historical landmark essential to both the Jewish community and the wider history of the city of London. The proposed development will heavily impact the synagogue's natural light.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	ben	Ash	It will block the natural light of the Bevis Mark synagogue which is not acceptable.	NO	Public Access	07-Apr-24
24/00021/FULEIA	Singer	T.	This important & historic building would be totally overshadowed and lose its light by the proposed tower.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Kissin	Ellesheva	Blocking light from incredibly important heritage synagogue for london's Jewish community.	NO	Public Access	07-Apr-24
24/00021/FULEIA	Rebak	Sandra	The building will overshoe the synagogue which is one of the oldest in the country and deserves protected status	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Cohen	Jaime	This would be an absolute travesty should it go through and should undoubtedly be rejected for permissions	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Ezra	Nicola	I wish to oppose in strongest terms this new proposal, particularly after the refusal two years ago and the adoption of the Creechurch Conservation Area. I was utterly shocked by this new application, which hardly differs frpm the previous and is completely inconsistent with the conservation of this Grade-1 listed building, which is now also in a conservation area, and is the most iconic historical Jewish site in the UK. The overwhelming feeling is that the new tower, to the Synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This utterly destructive proposal - metres from British Jewry's iconic, deeply historical religious monumental Synagogue, is totally unacceptable, particularly along its sensitive southern exposure. Please urgently ensure that this renewed application is rejected.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Assor	Marc	The construction of a 44 storeys building will deprave the synagogue from natural light . The synagogue is an historical building and the new tower will denature completely the sight.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Jacob	Deni	It will ruin and block all light into the landmark that is bevis marks synagogue	NO	Public Access	07-Apr-24
24/00021/FULEIA	Gartner	Moira	It saddens me to think that such a building would be considered to be erected in front of this beautiful listed building. The loss of light, and the feeling of such an overwhelmingly imposing building is really not appropriate. Please do not build this here.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Davidson	Pamela	I feel that the proposed 43 storey high tower would be out of character with some of the historical landmarks in the area. In particular, it would dwarf the unique and beautiful Bevis Marks synagogue and reduce its natural light. On these grounds, I urge the committee to turn down the application.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Cowan	Natasha	31 BURY STREET I'm writing to express my strong opposition to this new application (24/00021/FULEIA) of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Best Regards Natasha Cowan	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Fish	Adam	This building will overshadow some historically and religiously significant properties. Blocking the natural light that is vital for these spaces to operate and exist in the same fashion as they have for over 150 years.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Wick	Sandra	I object to the threat of cutting the light to one of the oldest synagogues in Britain by this proposed building. It will be way too crowded. I strongly object.	NO	Public Access website	07-Apr-24
24/00021/FULEIA	Davidson	Laoise	This decelopment would negatively affect the amenity of Bevis Marks Synagogue, a very important part of the Jewish Community in London	NO	Public Access website	08-Apr-24
24/00021/FULEIA	P	Be d	It is an inappropriate proposal and denies the synagogue of ancient right of light. Must not g ah	NO	Public Access	08-Apr-24
24/00021/FULEIA	Gocman	Mike	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	ISAAC	SAMUEL	This will obstruct the light, view and environment surrounding Bevis Marks synagogue, one of the oldest synagogues in London. Developers only care about profit in this instance and not about the local area.	NO	Public Access website	08-Apr-24

24/00021/FULEIA	Yanovich	Leonid	Bevis Marks Synagogue is the oldest continuously used synagogue in Britain, dating from 1701. a Grade 1 Listed building of enormous historic and cultural significance, being in effect the cathedral church of Judaism. it has suffered tall buildings being erected around it. However, the very important southern sky view remains unobstructed, enabling the moon and the stars to be viewed from the courtyard. The area now being designated a Conservation Area. 43 storey tower would completely overwhelm the synagogue. It is inconceivable that such a building would be allowed next to St Paul's cathedral. It would destroy the southern sky view, which is an essential part of the setting of the synagogue and contributes to religious ritual, reducing the useability of the courtyard for rituals and celebrations. It would further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area, damaging the setting of other heritage assets. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority. The developers are arguing that they are providing benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many are simply features that would be expected in any modern commercial building. The City Corporation is required to identify locations suitable for tall buildings. Much more work to be done and assessed by an independent inspector. This is unlikely to be complete before late 2025.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Blake	Nena	As a significant building in the history of Jewish life in London, I object strongly to this plan which will effectively put a stop to Jews being able to use it for regular worship. A past proposal has already been rejected and nothing in this current plan appears to change the reasons that it should go ahead. My sister was married in Bevis Marks synagogue; the event was unparalleled and very beautiful. Why should future couples be denied this glorious setting to mark their special day? Please do not pass this request to destroy such a special, unique and significant feature of London's history, which is effectively what will happen if it is not allowed to continue to be used due to lack of light and being overshadowed by modern monstrosities.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Harris	Frank	This application should be not receive permission to proceed as it will impact on an historic City of London 'living' cultural landmark. The Corporation of London should be proud to save its heritage for future generations rather than allow the greed of developers to destroy its greatest assets.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	taylor	Katherine	It will impede the worship and access of the historic London Jewish community to the Bevis Mark synagogue, overlooking and blocking out natural light to existing properties including residential.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Marks MBE	Ella	The proliferation of tall buildings in this conservation area is ruining the whole ethos of the neighbourhood	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Lane	Charlotte	The impact on the synagogue is significant, this is a historic building and a place of worship and contravenes what is rightly a conservation area.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Lanceman	Stuart	It is a travesty being done to a historical building.	NO	Public Access	08-Apr-24
24/00021/FULEIA	Eden	Bryan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of British Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Tresman	Janet	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the British Jewish community. Also, I serve as a Deputy on the Board of Deputies of British Jews, as well as being a committee member of another Charity. I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important and precious Jewish heritage site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's oldest synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	08-Apr-24
24/00021/FULEIA	stanton	chaim	It would affect the light in the nearby synagogue, which because it is so old depends on natural light. The nearby synagogue is the oldest in the UK. I don't understand why the developers are trying again. The synagogue will oversize the new building. It would block the view of the moon which could affect things like "kiddish levana" blessing of the new moon. It would create additional wind in the courtyard as well.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Davidson	Anthony	As a proud Londoner for over 60 years I am distraught that a building such as the one proposed would even be considered. Notwithstanding the physical restrictions it would impose on Bevis Marks Synagogue (eliminating the southern sky view, restricting light, making the courtyard - often used for various religious and celebratory events and services, etc.) a 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. One would certainly, and correctly, not allow such a structure to be built next to any house of worship. Furthermore, if I understand correctly, the development site is within the Creechurch Conservation Area and panning policy does not allow tall buildings in Conservation Areas, would the proposal not be in direct conflict with the statutory development plan. As a Jewish Londoner, I have had occasion to attend services in the Synagogue and it is inconceivable that a house of worship of such historical and functional importance should have it's practical and spiritual functionality compromised to the extent that it would make it at best difficult and at worst almost impossible to continue observance of all the prayers, services and celebrations that take place there.	NO	Public Access website	08-Apr-24

24/00021/FULEIA	seymour	tony	I wish to express my strong opposition to this new application (24/00021/FULEIA). I am shocked and appalled to see this new proposal, especially after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application has hardly changed since the last time it was submitted, which is disgraceful . It is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, and would block out the religiously important southern sky-view. It would overshadow the synagogue and its courtyard, which would result in significant loss of its remaining light. This proposal should not be permitted metres from British Jewry's Cathedral synagogue, especially along its sensitive southern exposure. I urge you to refuse this application. ==	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Antian	Raymond	I am an attender at services and not only would the proposed work cause terrible inconvenience to myself and other worshippers, it would also be difficult and dangerous to access and use the synagogue premises for people of my age and older. I cannot imagine the possibility of destruction that may ensue, accidentally or criminally. The synagogue was here long before the planning application for over 300 years. The synagogue building therefore demands your respect and begs you to consider far more suitable alternatives. STOP THE DEVELOPMENT!	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Sasto	Daniel	Hello. I'm writing to express my strong opposition to this new application (24/00021/FULEIA). My family are long-standing members of the Bevis Marks' Spanish & Portuguese Jewish community, and I am disappointed and saddened to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. As a Chartered Surveyor myself, I look at this new application, barely changed since the last time it was submitted, and quite clearly see that it is not in keeping with the safeguarding of a centuries-old Grade-1 listed building, which is in a conservation area, and is the most important Jewish site in the UK. The new tower (as with the previously rejected planning application), would completely and utterly dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This would seriously endanger the safeguarding and ongoing operations of the synagogue, and suffice, to say, this kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue. As such, I strongly urge you to refuse this application without delay.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Hart	Paul	It is of great historical importance as it is the first synagogue in England 17th century Due to religious observance it will not allow sunlight to be seen at the start and end of our services	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Stone	Robert	Two years ago planning permission was denied for a 48 story tower on this site mainly because of its extremely detrimental impact on the Grade-I listed Bevis Marks Synagogue. Now there is an application for a 45 story tower. This is a negligible change and the impact on this historic building - and no less importantly, on the Jewish community that uses it - will be equally devastating. It will still block out the view and significantly reduce the the light available to the building. Please refuse this terrible betrayal of a building central to the history of British Jewry, and still important for the UK Jewish Community, (and celebrated and honoured only last year by a commemoration led by the Archbishop of Canterbury)	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Krantz	Martyn	Synagogue needs natural light	NO	Public Access	08-Apr-24
24/00021/FULEIA	Blain	Barry	I am writing to object strongly to application 24/00021/FULEIA, the demolition of Bury House and partial demolition of Holland House and Renown House, and the erection of a 43-storey building on these sites. A similar application was refused in 2022, one reason given being the overbearing and overshadowing impact of that (smaller) development, which would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting. The synagogue was built in 1701, is a Grade 1 Listed Building, is probably the oldest synagogue in Europe to have remained in continuous use, and is the only non-Christian house of worship in the City. It has only limited electric lighting, and the interior relies on candles plus daylight from the windows which look on to the area of the proposed construction. The projected skyscraper would block much of the natural light through the windows, leaving the inside dark and gloomy. The development would be overbearing and oppressive because of its height and its proximity, and severely harm the historic setting. The City of London Local Plan January 2015 requires that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted. It further identifies that in the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns, etc. The proposed development is of course within the Creechurch Conservation Area. The current proposals would simply destroy 300 years of history. As a final consideration, it must be acknowledged that City already hosts many office blocks which are partially or completely empty, and there is absolutely no need for yet another. I hope the application is refused.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Platt KC	Eleanor	i oppose this application on behalf of the local Synagogue which is an historic monument and would be greatly affected by this proposal. This new application has barely changed since the last time it was submitted. The suggested new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Frankel	Rachel	We oppose building a 45-storey tower that will block the air and light from London's oldest synagogue. We're aware that Jewish history and culture count for very little in today's world, and we also realise that isn't much that thoughtful people can do in the face of big money to preserve something of great cultural importance.. We just wonder how you would feel if your church, the one you were married in, the one your ancestors was baptised in - what if rich and powerful people built tower blocks on all sides? Would you go home to your mother, your grandmother, your wife, to say that you had approved the ruin of a place dear to their personal histories? Jews have very little tangible history left. For so long the rich and powerful have denied them this, and here is yet one more example of a kind of thoughtless, evil theft that has affected so many Jewish people over so many centuries. This is just one voice, but we are working hard to ensure that thousands of others speak up and force the end of this terrible, selfish decision.	NO	Public Access website	08-Apr-24

24/00021/FULEIA	Kruger	Doreen	I wish to object to this application. Bevis Marks synagogue is a Grade 1 listed building of significant historic importance and this monstrous development is totally unacceptable. It would dominate the synagogue, and its courtyard, and deprive it of its natural light thereby utterly destroying its unique spiritual atmosphere and rendering the interior almost unusable. Would such a proposal even be considered alongside St Paul's? It would be unthinkable. This unique synagogue must be afforded the same protection.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Zekaria	Ezra	With reference to application ref. 24/00021/FULEIA, I object to this development in the strongest possible terms and I urge the refusal of it.This massive and dominant building would block out vital light from the south for Bevis Marks synagogue and its courtyard; one of the oldest places in worship, a jewel in the crown of the Jewish faith in the UK and also across the world. This is a Grade 1 listed building in the designated Creechurch conservation area. Such a proposal would desecrate a holy and religious place vital for the community, and amount to an architectural and planning travesty.The original decision to refuse this application was the correct one, and no attempt by the developer to come back again should be considered.'	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Rosenberg	Philip	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of British Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. Bevis Marks, as the oldest synagogue in continued use in the UK, has a special status to our community, and to the wider public. Designed by a Quaker architect in an act of inter-religious solidarity, it bears tribute to so much that is good about this country, in terms of diversity and inclusion. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. The whole situation bears a striking resemblance with the story of the Tower of Babel in Genesis Chapter 11, where hubris led vain people to build a tall tower in defiance of the Divine Will. I urge the developers to recall that, in that case, G-d's response caused them to "cease to build", which is what should also happen here. I urge you to refuse this application.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Gerrard	Rachel	This Synagogue is part of my heritage and was my Great grand parents and my Grandparents synagogue. It holds great important to me as a Jew	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Wernick	Richard	Such a new building will have a detrimental effect on the area surrounding Bevis Mark Synagogue with no appreciable gain for worshippers or visitors	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Loewenthal	Adrienne	I object to the proposed development as it will overshadow a building of historic importance (Bevis Marks synagogue) and take away its natural light. The synagogue is not only of great importance to the Jewish community as it was the first synagogue in London and is still a functioning synagogue but it also has huge historic value to the greater community. Any development around the synagogue should be within keeping of retaining the synagogue's integrity and this one will not	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Lorie	Miriam	Bevis Marks is a historic and spiritual gem in the heart of the City. It should not be further overshadowed and crowded in, just for the sake of commercial profit. Our City is better than this.	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Marks-Bluth	Jonathon	I wish to object to the building of the proposed 43 storey tower at 31 Bury Street. The proposed building would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. I regularly attend services at Bevis Marks synagouge, I was married there as were my parents-in-law and wife's sister. The synagouge is of enourmous importance to my community, the broader British Jewish community and British history. As I understand the situation, the development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. Keeping to such plans is vital for local authorities, so as to ensure public confidence in the transparency and fairness of such planning scheme. Further, as work trends change and fewer people commute into the City daily, I doubt the neccesity and wisdom of allowing the construction of further large tower blocks in the City, as they have a good chance of being significantly underutilized. This would further add to the decline of the City's urban environment. Best, Jonathon Marks-Bluth	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Abrahams	Carole	I am writing on behalf of Catford & Bromley Synagogue, which I represent on the Board of Deputies of British Jews. We are seriously opposed to application (24/00021/FULEIA) which is hardly altered from the previous proposal, which was refused 2 years ago. Although we are situated in the London Borough of Lewisham, the beautiful Bevis Marks Synagogue, which is the only synagogue in the City of London, is part of our heritage as Jewish Londoners. The synagogue is an important part of the history of London, having been visited by Samuel Pepys and mentioned in his diaries. Bevis Marks is a Grade 1 listed building in a conservation area. The proposed tower, if permitted, will dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	08-Apr-24
24/00021/FULEIA	Levy	Mark	Protect Jewish historical sites!!	NO	Public Access	08-Apr-24
24/00021/FULEIA	Tenenbaum	Linda	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? My daughter was married in the synagogue 20 years , nowhere else provided such an amazing atmosphere and bevis marks holds a rich heritage for future generations. Don't knock heritage, don't destroy because you can.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Goldenberg	Philip	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of British Jewish community, and spent much of my my working life in the City of London. I am appalled to see this new proposal, particularly after the refusal of its similar predecessor two years ago, and the recent adoption of the Creechurch Conservation Area. This new application is wholly out of keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important historic Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	09-Apr-24

24/00021/FULEIA	Grubin	Helen	Bevis Marks has recently been placed within a conservation area. Despite this, a new skyscraper is proposed in its vicinity. It is not much lower than a proposal that was dismissed a couple of years ago. This new scheme will not only affect Bevis Marks in a negative way, impacting on its light and viability, but also changing the City for the worse. If accepted, the conservation area will see yet another tower and there are already a number which do not have full occupancy. The proliferation of towers with little thought given to their use or impact on the fabric of the city should be resisted. Bevis Marks has been standing for over three hundred years. The same is not true of some of the skyscrapers in the city which have a relatively short life before being deemed too old to refurbish. Bevis Marks is a functioning synagogue and provides a service not only to the Jewish community. It should be well protected, not undermined by this new proposal.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Addlestone	Rafi	The tower along the synagogue's southern horizon would destroy the setting of Bevis Marks synagogue, which is so important to traditional ritual and to what makes the synagogue a community hub, and would reduce the synagogue's natural light levels beyond usability.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Dinkin	Raymond	This development would ruin the environment and light of Bevis Marks Synagogue which is an important and historic building.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Jay-Brown	Chelsey	This proposal of a 45 storey tower a stone's throw from Britain's 300 year old Grade 1 Listed Bevis Marks synagogue would destroy the setting of the synagogue, which is so important to traditional ritual and to what makes the synagogue a community hub and it would reduce the synagogue's natural light levels beyond usability.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Levy	Neville	As a user of the Synagogue with long family connections, the loss of light would be a disaster for the synagogue and the multi cultural heritage of the City of London. Please ensure this application is refused.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Shaw	Barry	Why are you contemplating to allow a building to be erected, which will take away light , privacy and a community buidind that is a hub for a religion for many years. Very disappointed	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Jay	Alison	This is a very old and important synagogue. What is proposed will affect it so much. Please DON'T do this	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Green	A.	London is all about the juxtaposition of old and new buildings. New modern buildings help to highlight old buildings, rather than detract from them. This is the case all over the City of London where historic buildings sit perfectly fine side-by-side with modern buildings. The debate needs to be based on facts, not on scaremongering. It's important that all the stakeholders in the City of London are heard, not just the group that shouts loudest. This new building has important benefits to businesses and employment in the area and should go ahead.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Martin	Howard	As a worshiper at Bevis Marks Synagogue since the age of 3 (now 63), I cannot believe that the City is allowing another application on this site. The function and sustainability of the Cathedral Synagogue of UK Jewry is once again threatened. Would this building be allowed next to St Paul's cathedral? Of course not. The proposal will restrict the light I need to read my prayers at services. Many others have poor eye sight and depend on the natural light. It would also badly affect our use of the historic courtyard, creating a feeling of being totally enclosed and putting the courtyard in darkness. And all of this is proposed in the same year as the educational and cultural Visitor Centre is opening. This proposal is an act of architectural vandalism with its impact on the Synagogue, courtyard and surrounding conservation area. What on earth is the City of London playing at? Bevis Marks is a grade 1 listed site, in a conservation area and at a time of anti semitism a precious jewel for Anglo and world Jewry. It's time for the City counsellors to do your job and reject this kind of development once and for all.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Flaxington	Frances	Serious concerns about the impact on the Bevis Marks synagogue, a building of significant historical, religious and cultural significance. This includes the reduction of light and affecting the southern aspect view.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Wheatley	Mark	I believe that this proposal is insensitive to the cultural, historical and religious significance of Bevis Marks synagogue. The proposal causes consternation to members of the synagogue because of issues with disruption during and after construction. I object to it.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	kwasnik	sefton	Sirs I live in the north of England, I have visited the Bevis Marks Synagogue, both for religious reasons and cultural ones. I strongly object to this application of for a high storey commercial building being constructed so near to Bevis Marks Synagogue, the impact of which would be disastrous for a place of worship, let alone the fact that this synagogue is an incredible heritage site, being the oldest synagogue in the UK. The mere thought of this seems unconscionable especially is this day and age. I have visited a number of ancient synagogues throughout Europe, including those in Budapest, Venice, Berlin ,Prague and also on the Greek Islands. It is wholly apparent that in all of those locations the community has sought to preserve and promote the importance of the original structure and presence of the building to keep alive the enormous history that such places of worship embody. They go to the heart of understanding the growth of the community and its persecution through the centuries, and in my very respectful submission the buildings and immediate surrounds should be left as close to the original presentation as is possible. Any development whether commercial or otherwise will deprive the entire community, and the world the opportunity to fully appreciate the significant history that this building represents. It would appear that over and above these observations the plans for the proposed buildings will no doubt have a significant adverse effect on the very important aspect of natural light within the holy place of worship. I would also expect that commercial developments nearby would dilute the history surrounding the building	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Patchick	Jonathan	I strongly object. As a member of the Jewish Community in Manchester who has had the privilege of praying at Bevis Marks synagogue when I have come to London. This grade 1 listed building is unique to the Jewish Community in the UK. Overshadowing the courtyard as proposed will restrict the light for praying and as a religion based on the lunar calendar and lunar activity will restrict visibility and again interfere with the ability to conduct service/ritual that has been able to be conducted at this site since circa 1700. It is shocking that our Capital City planners are even to be considering such a proposal affecting such an iconic and unique synagogue; this proposal must not go ahead as it is tantamount to destruction of religious practices that current and past generations would want to pass on to future generations to be able to pray at Bevis Marks.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Avisror	Elaine	This will ruin the Synagogue by reducing the natural light beyond usability	NO	Public Access	09-Apr-24

24/00021/FULEIA	Del Monte	Richard	I wish to object to this new application (24/00021/FULEIA). I am a member of the Spanish & Portuguese Jewish community. I have regularly worshipped at Bevis Marks Synagogue and was married there. I strongly object to this new proposal, particularly as a similar proposal two years ago was rejected. 1. The proposed development, like the previous proposal, conflicts with the conservation of the Synagogue, which is a Grade 1 listed building and is now also in the Creechurch Conservation Area established by the City Corporation only a few months ago. The City Corporation rightly rejected the 2022 application and should do the same again now. 2. There is no point in creating a conservation area and then allowing serious harm to one of the few remaining heritage buildings in that area. 3. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, diminishing its remaining light. The prospect of the sky above is an important part of the heritage ambience of the entrance and courtyard area within the immediate precincts of the synagogue 4. The proposed development will have a substantial negative impact on the heritage significance of the Synagogue. It would completely dwarf the synagogue. 5. The foundations of the Synagogue are also highly sensitive and vulnerable. Should development of these office buildings progress there is a potential for significant damage occurring to the building. 6. The Synagogue is the most important Jewish site in the UK. It is an asset for the City of London, and is of national significance. This kind of proposal would not now be accepted within the vicinity of St Paul's Cathedral, and should certainly not be permitted just yards from the oldest synagogue in the UK (which is even older than St Paul's), particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Warden	Angela	Bevis Marks Synagogue is built in the style of the Sephardi Synagogue in Amsterdam and is of great historic importance not only to the life and culture of the Sephardic Jewish community in London and UK but also the entire nation. My great great grandfather David Aaron de Sola was one of its most famous ministers. His son Samuel de Sola, was elected in 1863 to succeed him as minister of the Bevis Marks. Yet another skyscraper in the City of London where there is a surfeit of unused office space because of increased working from home is not desirable. A clear space around such a building of great architectural importance overrides any overdevelopment in the area. https://en.wikipedia.org/wiki/David_de_Aaron_de_Sola	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Hall	Rachel	Bevis Marks is a stunningly beautiful and historic synagogue in an already congested and unsympathetic environment. The proposed building would vastly overwhelm and overshadow this unique patch of London's multicultural history. Roughly the same age as St Paul's Cathedral, Bevis Marks should be given its due respect and share of sunshine.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Weichselbaum	Aaron	As someone who has enjoyed the hospitality of Bevis Marks Synagogue and celebrated my son's marriage to his wife there I would want the Synagogue to be equally available to them with the same splendour and significance as it has been for over 300 years. Any diminution of light will not only detract from the ambience of the Synagogue itself but will also prevent worshippers from observing the customary monthly blessings over a new Moon from within the grounds of the Synagogue itself. In the same way as one would not wish to see any historic place of worship dwarfed and obscured by an unsightly and unnecessarily enormous structure along it, I trust those entrusted with making the final decision will acknowledge and accept that this is a step too far and once and for all decide to abandon any further thought of threatening a part of our history and heritage. One also fears for the structural of Bevis Marks Synagogue itself with the amount of drilling and excavation that will be necessary to build a four storey basement below ground level. I write as someone who has had experience of damage to my previous property occasioned by a neighbour's works two doors away building a basement one level below ground. As with all such works, the on-going impact will be detrimental to the Synagogue and worshippers who will have to put up with significant disruption, noise and pollution - rendering it impossible for meaningful prayer and celebratory events.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Collins	Genene	It is appalling that this beautiful and listed building, Bevis Marks Synagogue, should be threatened by a plan to build yet another vast office block which, in all probability, will be redundant before it's built as demand for office space reduces. Canary Wharf is a good example of oversupply. We should be doing everything we can to protect this beautiful, unique building which is part of the history of the city.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	caplin	esther	The proposed building will overwhelm the grade 1 listed Bevis Marks, which is a significant and important historic building. This was built in the 18th century and represents the freedom of a minority group to worship and become proud residents of London. The proposed building will block worshippers views of the sky as well as dominate the environment. We must preserve heritage, and this means not only buildings but environments too. The City of London could lose all its magic with development of this kind. Why does the City need a tower block this tall? These are not sustainable. We are surely now in an era of human scale not corporate scale - and this sort of building is now out-of-date. Surely the City's planners are sufficiently progressive to see this? We might destroy everything for short-term gain, which cannot be what the City of London wants.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Woolf	Martyn	As the owner of the site of the proposed building is clearly only interested in his profit, would it be possible to find out how much he expects, or hopes to make, from this development. Perhaps the public may be prepared to contribute to a fund to satisfy the owner's expectations. I feel sure that many would support his plans to build a villa on the Riviera, or a new super yacht. That way, the general public may be able to continue to enjoy this area of the City without a further intrusive monument to one man's greed.	NO	Public Access website	09-Apr-24

24/00021/FULEIA	Sackman	Paloma	I strongly object to this application. I have been a member of the Spanish & Portuguese Jewish community. I regularly attend and many of my family have celebrated their weddings there. Bevis Marks Synagogue is the jewel in the crown of this country's Jewish community and one of which the City of London should be proud and anxious to preserve. The current application has barely changed from the developer's original application in 2022, to which I also objected. In the context of the setting of the synagogue, the difference between a 45-storey tower and the previous 48-storey tower is negligible. The proposed development, like the original proposal, is totally at odds with the conservation of a Grade 1 listed building, which is now also in the Creechurch Conservation Area established by the City Corporation only a few months ago. The new tower would overshadow the synagogue and its courtyard and crucially reduce the natural light illuminating the synagogue's interior, materially impairing the environment in which religious services take place and have done so continuously since 1701. Further, the incorporation of 4 basement levels in the new building would risk damaging the very structure of the 323-year old synagogue. The City Corporation rightly rejected the 2022 application and should do the same again now; there are more than enough tall buildings in the area. What is the point of creating a conservation area and then allowing irreparable harm to one of the few remaining heritage buildings in that area? Such a proposal would never be entertained near St. Paul's Cathedral and should not be permitted just yards from the most important Jewish building in Britain.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Martin	William	I have been worshipping at Bevis Marks Synagogue since I was a young boy, and once again the function and sustainability of the synagogue is being put at risk by this application. This proposal proposes severe restrictions to the light I need to read my prayers at services on the Sabbath and holy festival days. In addition, it would have negative impact to our use of the courtyard, shrouding an important area of community and togetherness in darkness. At a time when anti-semitism in London is at record levels, we need our safe spaces. This is a Grade 1 listed site in a conservation area; the space and its worshippers must be respected by rejecting this kind of development once again.	NO	Public Access website	09-Apr-24
24/00021/FULEIA	Kass	Harvey	I totally support the well argued case set out in the Bevin Marks objection.	NO	Public Access	10-Apr-24
24/00021/FULEIA	S	Adam	I object strongly to the proposed development, which is fundamentally unchanged from previously submitted plans.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Clemence	Sara	We should protect our historic buildings and protect the ability to worship. Ridiculous that this has already been turned down and it is being resubmitted. Pure folly.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Kamenker	Victor	I vehemently object to the construction of a new, 45-story office tower adjacent to the historic Bevis Marks synagogue. There are 10 new office blocks scheduled to go up in the City of London by 2030. With return to office uncertain and plenty of vacant office space in Canary Wharf and elsewhere in Zone 1, what is the imperative behind the construction at 31 Bury Street, with its outsize impact on the Spanish and Portuguese Jewish community? Bevis Marks is a Grade 1 listed building - the positives of another office construction adjacent, on balance, will not benefit the neighbourhood and will adversely impact the Congregation (whose members are part of the most discriminated against minority group in history). There will be reductions to the Synagogue's naturally occurring light, which will limit worshipper's ability to see prayer books in the building; the courtyard will be fully enveloped by skyscrapers - rendering its use as a communal space moot; and due to security constraints and the already semi-hidden location of the Synagogue, worshippers and congregants risk being pushed further underground. Would we allow such a development to negatively impact any other religious group -- adjacent, say, to St. Paul's or the Central London Mosque? Why is it thus under consideration for the second time in as many years to threaten the conservation area surrounding Bevis Marks Synagogue?	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Davis	Robin	This would have a very significant impact on Bevis Marks Synagogue, a Grade 1 listed building which has a great cultural significance. The application, should it be successful, would overshadow the courtyard and block the sky from the South.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Isaacs	Edward	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of British Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Grunwald OBE KC	Henry	I am amazed that this matter is even being considered, given the recent refusal of an almost identical plan. I object, as a Londoner who lived his early life just outside the City boundaries and who has, on the whole, been happy with the way the City has been developed. I am a member of the London Jewish community - Bevis Marks is the most important living symbol of our centuries-old links with, and involvement in, City of London life My reasons are:- 1) Such a tall tower would utterly overwhelm the synagogue, a Grade 1 Listed building of enormous historic and cultural significance. 2) It is inconceivable that such a building would be allowed next to St Paul's Cathedral. Why is the synagogue not afforded the same protection? 3) The proposed building may be well-designed but is simply in the wrong place. 4) It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and of the stars and planets would be blocked. 5) It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. 6) It would further reduce the minimal daylight that now penetrates the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. 7) The development site is within the Creechurch Conservation Area. Current planning policy does not allow tall buildings in such an Area; there is a direct conflict with the statutory development plan. 8) The developers argue that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. 9) The proposed building would also damage the setting of other heritage assets in the local area and would compromise the Conservation Area as a whole.	NO	Public Access website	10-Apr-24

24/00021/FULEIA	Braham	Syd	I strongly oppose this new application (24/00021/FULEIA). As a member of the UK Jewish community I dismayed at this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This latest application, is marginally different from the the previous submission; it is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and the synagogue is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, almost blocking its remaining light. This kind of proposal would surely never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted so close to British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. Please refuse this application	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Northcote	Jane	As a City resident and worker I object to this proposal. The proposed new building will overshadow a Grade 1 listed building and relegate it to a chasm. The City of London is rightly proud of its cultural sites. It is wrong, and against the City's own policies, to treat such an important religious and cultural site in this negligent way. The existing building in Bury Street, a mere 40 years old, could be re-fitted, which would be in accordance with the City's own "retrofit first" policy and carbon neutral aims. If this policy is to be disregarded, does the policy have any meaning atall? The proposed building is in a conservation area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. At a time when the City should be respecting diversity and culture within the Square Mile this proposal disregards the needs of a specific faith group, who have used this location for centuries. The proposal consigns the Jewish people who use this synagogue to worship in a chasm. This does not meet their needs. As a citizen of the City, I am appalled that the applicants are treating people in this way, with a lack of respect for their traditions. We want all faiths to flourish and feel welcome here. I value the diversity of cultural and religious institutions in the City, and want them to continue to operate in the future, for the benefit of everybody. This proposal threatens the very existence of an institution which is over 300 years old. It is not simply a building, but the location of a living tradition, dependent on people, light and space in order to fulfil its purpose. The light must not be removed: for that would degrade its usefulness and purpose. The synagogue is an amenity not only for Jewish people, but also an important part of London's living history, valuable for all Londoners. This proposal must be rejected, and the applicants instructed not to try again.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Szasz	Michael	The historical value and cultural significance of this place of worship, being the oldest continuously used synagogue in the country, cannot be underestimated. It is not only the home of the Sephardi community in this country but a centre of tourism for many around the world. If it were any other equivalent religious centre, it would be held in the highest esteem by the community and protected from the severe damage that this project would undoubtedly cause. The proposed plan to build a structure of this size, at this site, would negatively affect the quality of life for those worshipping at Bevis Marks and interfere with a number of essential practices and traditions. Bevis Marks represents not just bricks and mortar but the very heart of British Sephardi Jewry. It has survived for hundreds of years in spite of all the odds and this proposed project would cause irreparable harm. Therefore, I object to the project.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Fineberg	Mark	It is preposterous to disingenuously suggest that the urban cliff edge culmulative condition caused by 100 Fenchurch St between the city tower block mass and the Tower of London would benefit from 'mediation' by a so called 'foothill' stepping-down building as a rouse for justifying inappropriate eastward extension of an uncomfortably bloated cluster of skyscrapers. The slight carving away of its uppermost NE corner of the proposal is a minimal concession compared to its overbearing height and impact on the historically sensitive Bevis Marks synagogue. The synagogue is protected by virtue of it being in a conservation area and the obfuscating impact assessment diminishes the significant harm that the development will have on it. This internationally renowned house of prayer and contemplation draws significant emotional awe from its quality of light and glimpses of the sky which will be lost when blocked by the new building. It was established previously that the development benefits do not outweigh the substantial harm to the synagogue's setting and this remains the case.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Persky	Sarah	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm very disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	10-Apr-24
24/00021/FULEIA	Motz	Timothy	I am a proud British Jew. I wear my identities with pride. It takes work for me to balance them - to avoid cutting myself off from my Jewishness or from mainstream society - but it's more than worth it. But my existence requires something back from the rest of society. The Jewish community is precarious, by dint of its tiny size it and its history. The City of London contains 46 churches but only one synagogue. When Bevis Marks's very character is endangered for the sake of a planning application, it's hard for not me to question the Corporation's real commitment to being a truly welcoming place for all faiths. The proposed development would seriously erode the character of Bevis Marks synagogue and the quality of ritual that is feasible inside.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Saady	Stephen	Synagogue Grade 1 listed, Britain's oldest, is in constant use by people from within and outside UK. It stands in a newly approved conservation area taking in Bury Street, to protect the synagogue from hazards posed by new office developments. I urge you to reject this recent application, as was done re an earlier building proposal for the same site. This synagogue is one of worldwide status. To force it to close would be no less than a tragedy.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Fink	Rachel	It is incomprehensible that there continues to be disregard for the preservation and conservation of this historic synagogue which is of importance both to the Jewish community as the oldest functioning synagogue in Europe and to the City of London. The diminishing natural light has a direct impact on worshippers and on the internal beauty of the synagogue. Bevis Marks plays a vital role in the local community that resides in the city and these continuous threats to such an historic site are a blight on the integrity of the corporation. This Grade I listed building is being overwhelmed despite promises for a proper conservation and protective area around its location. There are more than enough high rise blocks in the city.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Jackson	Hilary	I strongly oppose the new development which will impact the Synagogue's natural light. Bevis Marks is very important as a historical building and the Jewish community have worshipped there for over 400 years and still do. It should definitely not be overshadowed by a high tower block.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Shenkin	Lawrence	Bevis Marks synagogue is an important historical and cultural site. Overshadowing its natural light would be a tragedy.	NO	Public Access website	11-Apr-24

24/00021/FULEIA	Singer	Helen	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Grzywacz	Andrew	The proposed skyscraper is being heavily opposed by persons associated with the synagogue at Bevis Marks, with the aim of refusing planning permission. Such a synagogue is located in a secluded courtyard surrounded by offices on all sides, accessible only through a small archway that is easily missed by tourists and other passers-by. Externally, it is quite a plain building of no greater architectural merit than many of the neoclassical structures in the vicinity. The synagogue does not, therefore, provide a significant cultural offering to the City beyond religious services to its attendees. (Note that such services would be unaffected by this new development: the issue of natural light within the synagogue has been addressed by the most recent redesign.) The City Plan 2040 aims to create 1.2 million square metres of office space, and turn the square mile into a seven-day cultural and leisure destination. Comparing what the proposed skyscraper offers to these ends against the limited contributions of the synagogue, it is clear that refusing permission to the former in deference to the latter would hinder the City's stated plan. The suggested compromise of retrofitting the existing building at Bury House would provide insufficient benefit, due to its lack of floor space. I therefore recommend that opposition from the synagogue is rightly overlooked, and that the proposal is approved.	NO	Public Access website	11-Apr-24
24/00021/FULEIA	Aleksander	Nicholas	Although I live outside the City, I come into the City to work Bevis Marks is a listed building and a hugely important heritage asset as the oldest place of Jewish worship in the U.K. Daylight is an essential quality to the continuing use of the building. And the construction of a tall tower so near to the building will harm its continuing usage. It is preposterous to disingenuously suggest that the urban cliff edge culmulative condition caused by 100 Fenchurch St between the city tower block mass and the Tower of London would benefit from 'mediation' by a so called 'foothill' stepping-down building as a rouse for justifying inappropriate eastward extension of an uncomfortably bloated cluster of skyscrapers. The slight carving away of its uppermost NE corner of the proposal is a minimal concession compared to its overbearing height and impact on the historically sensitive Bevis Marks synagogue. The synagogue is protected by virtue of it being in a conservation area and the obfuscating impact assessment diminishes the significant harm that the development will have on it. This internationally renowned house of prayer and contemplation draws significant emotional awe from its quality of light and glimpses of the sky which will be lost when blocked by the new building. It was established previously that the development benefits do not outweigh the substantial harm to the synagogue's setting and this remains the case.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Charles	Michelle	I am very sad to hear that you want to build a multi storey building to tower over Bevis Marks Synagogue. The esseence of this congregation is all about light, how we can bring light into our world. What you propose here nulifies this building, and our community. My grandfather came to London as a refugee from Cairo and this building is the only place we have to congregrate as sephardi people, that is huge. I would be happy and willing to meet with anyone if you would like to hear more about why you must appreciate our London, that is, that architecture here and what buildings are often used for (to bring people together) is essential. Your idea of a post modernist sky scraper is creative and unrelated to this building, it hinders the light and nulifies the ability to pray in community. Imagine thousands of Arab jews who had to flee and were allowed here in the UK not being allowed to pray any more and having to hide in the dark shadows instead. Would you consider buidling sometjing that compliments and brings light to our neighbourhood for prayer? With nest wishes, Michelle Charles	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Chapman	Ariel	Having visited Bevis Marks synagogue on multiple occasions I am outraged and disgusted that the developers believe this proposal to be in any way acceptable. Bevis Marks is an important, historic national landmark still in use today by locals and visitors. This proposed development would destroy the nature of the building, its access to natural light and the spiritual peace it offers to so many. Bevis Marks must be protected at all costs, it is simply unconscionable that such an important part of both British and Jewish history can be threatened in this way.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Ellis	Edward	This scheme can surely only be objected to as a planning application and for listed building consent application on the grounds of the irreparable harm it would cause to the Bevis Marks Synagogue which is a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. Policy DM 12.2 Development in conservation areas identifies that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys. The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. I must object to the planning application and for listed building consent application on the grounds of the forever harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. The proposed development is also within the Creechurch conservation area, and will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2. The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	djanogly	david	i am a member of the S&P Jews' Congregation this important part of history is imperative to be preserved. I was married here and regularly attend services. The City of London is already densely occupied with landmarks, and this is no different. all new development should take absolute care to protect assets of significant community interest as well as those of grade 1 status. the developer is approaching this speculatively, the protection for this asset of value is well documented, and their advisors have clearly been arrogant to suggest they should present something which undoubtedly harms the use and experience bevis marks synagogue.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Latter	Carole	The idea of this monstrous building being built next door to the beautiful synagogue fills me with dread. Who could possibly agree to this plan?	NO	Public Access website	12-Apr-24

24/00021/FULEIA	Hayim	Alex	I strongly object to this proposed planning application. This will undermine the running of Bevis Marks Synagogue, a building that has been at the centre of Jewish life in London and throughout the UK for hundreds of years. This historic and beautiful building should be protected by the planning authorities today and in the future. Any attempts to develop towers that overlook Bevis Marks Synagogue and shows no consideration or understanding of the the history in this part of London should be thwarted.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Abrahams	Bianca	This is an unacceptable building project that will completely block the light of the synagogue and destroy the building as a place of worship. It would be tragic to let the building go ahead.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Morgan	Leslie	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm an attender at Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Ballen	Russell	Wrong development in wrong area.	NO	Public Access	12-Apr-24
24/00021/FULEIA	Brodie	Philip	I would like to echo the other criticisms as I feel that this development ignores the treasure of historic buildings in the area. Bevis Marks represents an important part of the city and its social fabric, and must be protected at all costs as much as possible for its intended use. Please do not ignore these important factors at your peril...	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Black	Aaron	It will over shadow a historic synagogue	NO	Public Access	12-Apr-24
24/00021/FULEIA	Hayim	Caroline	Bevis Marks Synagogue is a jewel in the City and as such I am firmly against any proposed planning application which threatens the existence of Bevis Marks as it stands today. To allow an application for towers which overlook the synagogue and surroundings would forever change this historic site. London has changed so much in the past few years. Please acknowledge the importance of preserving this outstanding unique historic building in the City of London and its present surroundings.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Brett	Richard	I object, in the strongest possible terms to this proposed development, which would have huge ramifications for historic buildings in the area - a Conservation Zone, containing the oldest synagogue in the UK. A 45 storey tower would completely overwhelm Bevis Marks synagogue - a Grade 1 Listed Building of enormous historic and cultural significance that was built in 1701 and has been in continuous use as a house of worship since then. The proposed tower would destroy the southern sky view, which is an essential part of the synagogue's setting, and important for the religious rituals. The view of the moon's passage across the sky, and many other celestial bodies, would be blocked. The tower would overshadow the synagogue and its courtyard for much of the day, limiting the use of the courtyard for rituals and celebrations. It would also further reduce the currently limited daylight that penetrates into the synagogue, making it even more difficult to conduct worship in this historic synagogue. Because of the historic nature of the synagogue, installing additional electric lighting is not practical. It is very unlikely that such a building would be allowed next to St Paul's Cathedral, so why is the synagogue not afforded the same protection? The Bevis Marks Synagogue has the same significance for the Jewish community as St Paul's Cathedral or Westminster Abbey have for the wider community. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. If built, this tower would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the whole Conservation Area. I therefore urge the Planning Committee to reject this proposal and thereby protect the Bevis Marks Synagogue, which would enable it to continue in use for at least the next 300 years.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Zagoria-Moffet	Mikayla	The devastating effect this would have on the Jewish community in the area is unacceptable.	NO	Public Access	12-Apr-24
24/00021/FULEIA	Querfurth	N	I'm writing to express my strong opposition to this new application. I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.I urge you to refuse this application'	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Posnansky	Rachel	Bevis Marks has been around for 300 years built in 1701 and is an iconic synagogue which has served its community. I got married there and would be very sad to see tower blocks built which would destroy the light as well as the surrounding area.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Monk	Gregory	This application would endanger a historical building that is in current use and should be completely refused.	NO	Public Access website	12-Apr-24
24/00021/FULEIA	Leigh	David	The proposed 45 storey tower is an outrageous imposition which would utterly overwhelm the synagogue, a Grade 1 Listed building of enormous historic and cultural significance. Furthermore, the tower would destroy the southern sky view, which is a vital part of the setting of the synagogue and would overshadow the synagogue and its courtyard for much of the day. Other justifications put forward by the developers are a transparently cynical attempt to manipulate the planning system and circumvent the wholly justified objections of the local, national and international community. It is to be hoped that the City of London will not contemplate such a gross violation of one of its most valuable heritage and community assets.	NO	Public Access website	13-Apr-24
24/00021/FULEIA	Lethbridge	Lucy	The squeezing of important historical landmarks under vast, bland, corporate modern skyscrapers is ruining the city that I have lived in all my life. All that is interesting and quirky about London's historical architecture is lost under the shadow of dreary functionalist buildings that could be found in any city in the world. And please ... let's keep the sky. Without it, the city is a place of darkness.	NO	Public Access website	13-Apr-24
24/00021/FULEIA	Strauss	Jimmy	I cannot believe that having refused building consent for a similar plan in 2022, you are contemplating granting consent for this monstrous development that would certainly be refused if it had been overlooking St. Paul's cathedral. Double standards with a hint of anti Jewish racism. For those that are unaware Bevis Marks Synagogue is a Grade 1 listed building that is over 300 years old. It continues to function as a place of worship and is a major tourist attraction. This new development will remove natural daylight and make it more difficult to hold Services in the Synagogue.	NO	Public Access website	13-Apr-24

24/00021/FULEIA	Pinto	Andrew	I am writing to express my strong opposition to this new application(24/00021/FULEIA) I'm a member of Bevis Marks Spanish & Portuguese Jewish Community and I am appalled to see this new proposal particularly after its refusal 2 years ago and the recent adoption of the Creechurch Conservation Area. This new application barely changed since it was last submitted is not in keeping with the conservative of a Grade 1 listed building which is now in the conservation area and is the most Important Jewish Site in the UK. The new tower to the synagogues immediate south would dominate the setting of the synagogue, block out the religiously important southern sky view and overshadow the synagogue and its courtyard. I urge you to refuse this application.	NO	Public Access website	13-Apr-24
24/00021/FULEIA	Musikant	Kris	This development will adversely affect the Bevis Marks Synagogue in the same way as the plans for this site, which were previously refused. It is a disgrace that plans for this site, so similar to the previous application are being reconsidered. Having recently unanimously agreed to the Conservation Plan, which afforded protection for this Grade 1 building, the City Corporation is now undermining its decision and renegading on the apparent protection the the Conservation Plan should have guaranteed. This synagogue is the only non-Christian house of worship in the square mile, standing almost unchanged for over three-hundred years and which my family have been part of for all that time - ten generations married under its auspices. St. Paul's Cathedral has protection, not only for the fabric of its building but also its site lines. The Bevis Marks Synagogue is the cathedral synagogue of the UK and should be afforded similar protection. This new / revised application should be refused.	NO	Public Access website	13-Apr-24
24/00021/FULEIA	Albert	Simon	This is yet another flagrant attempt to effectively destroy the oldest continuously functioning synagogue in the UK. This tower along the synagogue building's southern horizon would destroy the setting of the synagogue - essential in traditional ritual and in making the place a community hub - and reduce natural light levels beyond usability. Please stop this and any other development like it around the synagogue and finally commit to preserving the country's irreplaceable heritage.	NO	Public Access website	14-Apr-24
24/00021/FULEIA	Pervez	Imran	It's a beautiful building plan providing much needed investment for the local area and so many jobs, just what we need in tough economic times. The design will add to the local area and for any complaints - they can invest in better lighting if this is an issue for the minimal amount of people actually using teh space that is objecting.	NO	Public Access website	14-Apr-24
24/00021/FULEIA	Musikant	Barry	I consider that this planning application should never have reared its head again in only a slightly revised format to that which has already been rejected. It is an absolute disgrace that the City of London Planning Committee that passed the Conservation Plan which was approved so recently should be undermined. This proposed development will have serious detrimental effects on the Bevis Marks Synagogue, which is a Grade 1 listed building and should have the same protection as St. Paul's Cathedral and the Tower of London. Would you do this to those buildings?	NO	Public Access website	14-Apr-24
24/00021/FULEIA	Peery	Alan	As the oldest Jewish Synagogue of London, this religion's primary building should be recorded the same respect as St Paul's cathedral.	NO	Public Access website	15-Apr-24
24/00021/FULEIA	Ramos	Rosa	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-Apr-24
24/00021/FULEIA	Yudkin	Michael	I am astonished, and appalled, to see this application. A very similar application was refused some two years ago, and since then the area has been made a Conservation Area. I am a member of the Spanish and Portuguese Sephardi congregation and attend Bevis Marks synagogue, although I live very far away (in Oxford). Bevis Marks has a particular meaning for me (my wife and I were married there), but it is not on personal grounds that I oppose the application. Bevis Marks is central to the life and the history of Jews in England, and it would be intolerably painful to the Jewish community to have it overshadowed by the proposed building. But more than that, the architecture and historic importance of the synagogue are of great significance to the community as a whole, well beyond those of the Jewish faith. It's not for nothing that Bevis Marks is Grade One-Listed. Apart from the many practical problems that have been mentioned (the noise during construction, the permanent loss of light and so on) the proposed building would suffocate the historic building and its beautiful courtyard, and would destroy its context. I hope this wholly inappropriate building will not be allowed to go ahead.	NO	Public Access website	15-Apr-24
24/00021/FULEIA	boujo	edward	I'm strongly against this proposal. It's a very tall building that will negatively impact Bevis Marks synagogue. It will prevent a lot of natural light from coming into the synagogue and its court yard will be compromised. It's beautiful building A great wine listed building and in an A great wine listed building and in a conservation area. How it could be deemed responsible to be building such an How it could be deemed responsible to be building such a tall building in a conservation area as beyond me. Furthermore, from what I understand, there are many empty, office buildings and Availability for office space is strong in London , in the city of London and with Canary Wharf. I questioned the need for extra office capacity in the city of London. I would like to see the city of London makers case for more office capacity. Please strongly reconsider this proposal and factoring the negative impact on Bavis marks synagogue.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Chernoff	Barry	There is no further need for a large tower office block in this area as there have been numerous built over the last 20 years and demand for office space is reducing as employees work both fully and partially from home. The 45 storey tower would completely overwhelm the nearby synagogue that is a grade 1 listed religious and community building. It would damage the natural light that the synagogue currently receives. The supposed planning benefits of this development do not stand up to scrutiny.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Goulding	Niall	The building is of a high quality and provides a much needed visual break from the glass curtain walls of its neighbours, and it's lower height is appropriate for the tapering off of the City cluster. It will enhance views of the city when viewed from the Royal Parks.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Simons	Josephine	I am very concerned about the Bevis Marks Synagogue if this goes ahead. The building would overwhelm the Synagogue, destroy the southern sky view, and overshadow its courtyard. There is no gain to the Community as a whole, and it would belittle even more of our London history and heritage.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	dhaliwal	Mandeep	This project is very well designed and is much needed. The extra office workers will help support other businesses and help the local economy. I feel the look of the project adds to the area rather than takes a way from it	NO	Public Access website	16-Apr-24

24/00021/FULEIA	Pemberton	Nichola	I object to the building of a structure so tall within the vicinity of the important synagogue nearby. The synagogue is of cultural significance and this building would directly affect the light within and the religiously significant view.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Albert	Brian	Destroying the invirament	NO	Public Access	16-Apr-24
24/00021/FULEIA	Morton	Catherine	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Sneader	Charlie	Fails to consider the position of Bevis Marks Synagogue.	NO	Public Access	16-Apr-24
24/00021/FULEIA	Kelvin	Philip	Dear Council. I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and a regular attendee and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. I am also a Liveryman and Ward Member nearby as well as a Freeman of the City of London. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this development send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? I urge you to refuse this application. Philip Kelvin	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Peterman	David	Will stop light and overcrowd the are	NO	Public Access	16-Apr-24
24/00021/FULEIA	Lawrence	Beverley	I write as a Freeman of the City of London, and as a regular visitor to Bevis Marks Synagogue, to register my objection to yet another proposed development on the doorstep of this Grade-I listed building. A Conservation Area has already been agreed to protect Bevis Marks Synagogue, so I am dismayed that this new proposal is being considered, particularly after its refusal two years ago. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-I listed building. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. Additionally, there are concerns that construction of this tower could potentially weaken the foundations of the synagogue, and will create noise, mess and disruption for the community. Bevis Marks Synagogue was built in 1701, and my family worshipped there for generations. It is the ONLY non-Christian place of worship in the City, and recent excavations have shown the site to be of great historical importance. Please protect this wonderful building instead of seeking to destroy it. Do not allow it to become the victim of cultural vandalism. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Morris	Malka	I cant believe that you are once again trying to undermine the decision made two years ago not to have any more tall buildings that will block natural light from reaching the historic Bevis-Marks synagogue. Shame on you! How many times do objections to your ill-founded decision to infringe upon the special significance of this 300 year old building have to be made. I strongly urge you to reconsider your plans to allow skyscrapers to be built anywhere in the vicinity of this unique preservation area. Let there remain one small section of the City of London to be preserved into the future as a unique reminder of London's extraordinary history. Thank you for considering this matter. Looking forward to a positive response.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Somekh	Ronald	Bevis Marks is the most important synagogue in the UK. To hide it in the shadows of a tower block will be a disaster. It is the oldest synagogue in the country and it's not fair to even consider smothering it with a monster shadow.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Rubinovich	Joel	Beavis Marks represents an integral part of the London Jewish community. It is there, and is used., not only by Londoners but also by people like myself who not only visit when in London on business but also attend at other special times. For example, I visited specifically at the special service honouring the accession of King Charles 111 who, I am informed, has a particular devotion to the synagogue. It is far too easy to demolish a property or to build one. The same cannot be said for a religious community.. Please do not yield to the demands of commerce and development but remember that London is not a creation of modernity but exists in an aura of tradition which is cherished.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Fraser	Lola	This project will affect an historical building: Bevis Marks Synagogue. It will block the light and make access constricted	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Benjamin	Janice	This synagogue is a very important building being the oldest on England.	NO	Public Access	16-Apr-24

24/00021/FULEIA	de Sola Mendes	Eliza	My family have a very long association with Bevis Marks. My 3rd great grandfather David Aaron de Sola was the Rabbi and my 4th great grandfather Haham Raphael Meldola was the Chief Rabbi of England. Bevis Marks has the longest continuous record of daily services unchanged even with WWII and the German bombings of London. No other synagogue sadly in Europe has this record. It is a great treasure not just for the Jewish community but for the legacy of the United Kingdom after Cromwell brought the Jews back to England. His Majesty, King Charles III has visited the Congregation and is Patron. Just as the area of the Tower of London is protected historic property so is Bevis Marks in its legacy for the Old City of London. The recent and ongoing encroachment of towering modern buildings in the area are a danger for many reasons for the light into the synagogue for the structural integrity of the ancient building. The City of London and the Government of the United Kingdom must protect the synagogue and reject this dangerous looming tower. There are so many other places in London they can build large towers this should not be one of them. I know that the following has been stated: A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability. Thank you	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Warren	Martin	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community. They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Skellon	Katherine	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm not a member of Bevis Marks' Spanish & Portuguese Jewish community, but a supporter of the synagogue and am interested in protecting its rich and important heritage. I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Geismar	Robert	Please don't ruin the historic and cultural character of the City forever by allowing completely inappropriate and self centred development.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	roth	brian	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Kreindler	Simon	Although I do not live in London, I was born in Barbados, a country whose Jewish community has a 300 yr. connection to the Bevis Marks Synagogue. As a historian, I am deeply troubled by plans to permit demolition and construction of a new high-rise building almost on top of the Bevis Marks site. This new building and its associated services will seriously compromise the unique Bevis Marks complex and overshadow an irreplaceable part of the city's history under yet another mountain of concrete. Does anyone in your administration care about anything other than enriching the developer (and his/her associates) in their determination to complete this project?	NO	Public Access website	16-Apr-24

24/00021/FULEIA	Silver	Lorraine	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Frojmovic	Eva	I'm writing to express my strong opposition to the application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am disappointed to see this new proposal, particularly after its refusal two years ago, and after the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building (Bevis Marks Synagogue), which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. Bevis Marks Synagogue is the Jewish counterpart of St. Paul's Cathedral and should be treated accordingly. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. The urban landscape around the historic synagogue would be ruined. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? That it's all about business to the detriment of heritage? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's 'Cathedral' synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Zeilinger	Tony	Poor placemaking and mitigations need to be made to let southern light access into the historic Bevis Marks Synagogue.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Kandel	Susan	Bevis Marks synagogue, in all its glory, has been a part of my community for hundreds of years. My great great grandparents traveled from Holland in the 1800s to settle close by and it has been part of my family's heritage ever since. It is a jewel in the heart of the City of London and a part of its living history. Our children and our grandchildren need to learn about the lives of their ancestors and what brought them to the City of London. The idea of engulfing it within a commercial development is heartbreaking. It needs its own space and its own light. The community has been praying within the walls of the Synagogue since 1701, using the light from the windows. Those windows must continue to allow the light to enter the building. Do not permit this development to happen.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Jackson	Daniel	It will materially affect Bevis Marks synagogue	NO	Public Access	16-Apr-24
24/00021/FULEIA	Haynes	Michelle	This building is totally out of character with Bevis Marks Synagogue and will totally overwhelm it.	NO	Public Access	16-Apr-24
24/00021/FULEIA	Getto	Melanie	Traffic or Highways Comments: I strongly object to this application of this 45 storey building being constructed so near to Bevis Marks Synagogue, the impact of which would be catastrophic for a place of worship, let alone the fact that this synagogue is an incredible heritage site, being the oldest synagogue in the UK. Bevis Marks is a Grade 1 listed building of enormous historic and cultural significance.The height of the proposed building will have a major impact on any natural light being visible in the synagogue's courtyard and it will be dwarfed by this multi storey building. It would destroy the southern sky view which contributes to religious ritual. The proposed building is to be built in simply the wrong place. The application will hem in the synagogue, blocking and encroaching on it's very soul, taking it's view of the sky, it's light, it's peace and tranquility and essentially negatively impacting the right of peaceful worship in the UK's oldest synagogue which has held regular services continuously for more than 300 years. My brother in law's family has had a seat there since the time of Oliver Cromwell. The development site is within the Creechurch Conservation Area and current planning policy is to not allow tall buildings in Conservation areas so there is a direct conflict with the statutory development plan. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building. The developers claims that they are providing planning benefits that outweigh the harm to the synagogue simply do not stand up to scrutiny and facilitating this monstrous development is disingenuous and would not be permitted within the vicinity of St Paul's Cathedral and therefore should not be permitted just metres from Britain's Jewry Cathedral synagogue.	NO	Public Access website	16-Apr-24

24/00021/FULEIA	Montagu	Isaac	I am writing to oppose this new development - as I also did the last time around. This new building seems no different and I don't understand why it's allowed to be resubmitted. I am a member of Bevis Marks Synagogue, and grew up in the Spanish & Portuguese Jewish community in its sister synagogue in Maida Vale. I have had a lifelong connection to the synagogue, as have many of its members, if not connections stretching back generations. I am now a musician and academic specialising in music of Sephardic Jewish communities, therefore I have this community, and the traditions I grew up with therein, to thank for my whole livelihood. For many within the community, the festive services each year in this building that people return from all of the country for, in some cases all over the world, are some of the most meaningful moments in our year. The historical significance of the building is also huge - not just the oldest synagogue in the UK, but the longest-running synagogue in Europe. Because of this, we have a visitor centre opening soon. With the closure during the pandemic of London's Jewish museum, this will make Bevis Marks the only public site to visit to learn about the UK's very significant Jewish community. This would be all be hugely impacted by this new skyscraper. It's an old, candlelit building, with big windows - the natural light is essential. If you don't believe me just go and visit - it's so so beautiful, really one of London's gems. Then reimagine it with this monster hanging over it. Our cultural heritage isn't worth selling off for another skyscraper. Thanks for your time and consideration.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Berk	Louis	I strongly object to this new application (24/00021/FULEIA). For the last 5 years I have been engaged by the Bevis Marks Heritage Foundation as the project photographer for the restoration of the synagogue and the creation of the new Dangoor Visitor Centre. During that time I have grown to appreciate the unique architectural, environmental and cultural importance of the Bevis Marks estate. It is similar to other sites of significant religious interest, for example the Methodist Centre in Bunhill Fields, St Pauls and Westminster Cathedrals and St Dunstans in the East. It is worth noting that in the case of these other sites, it is clear that the planning authorities take seriously their responsibilities to preserve the area from the venal self-interest of unnecessary architectural vanity projects. For the City of London to consider this appalling addition to the local area, adjacent to the Creechurch Conservation Area is beyond belief. In recent years City of London planning decisions have completely ignored the impact on all Londoners who are compelled to watch our skyline dominated by cynical vanity projects, without architectural merit and planned for short lifetimes (for example buildings on the Broadgate Estate barely 20 years old are already being replaced, so why were they built in the first place?). What kind of architectural heritage is the Corporation providing for future generations? It appears the decisions are only for the generation of income for the Corporation and not cultural capital of all Londoners. Think of the wider responsibility you have to all Londoners! I cannot even understand why in the age of increasing home-working the City needs more commercial space.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Lovric	Michelle	This is a Conservation and Heritage outrage. A Grade 1 listed site of supreme cultural and spiritual interest cannot be permitted to bullied and overwhelmed by a high-rise tower. If it can, then the City of London should be ashamed of prioritizing developer money over its precious historic stock.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Mizrahi	Paulette	This building will encroach on the functioning synagogue and all aspects surrounding life of its worshippers.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Poll	Michael	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a daily user of Bevis Marks Synagogue and am displeased to see yet another application that seeks to compromise the historic and unique setting of the synagogue. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. It is the oldest continuously functioning synagogue in Europe and potentially the world. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This development would demonstrate that the City of London Corporation does not value its unique historical monuments, which are to be celebrated and not overshadowed. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Boyar	Michael	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24

24/00021/FULEIA	Sherwood MBE	Peggy	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue. It seems unbelievable there is a new application after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, which is hardly changed since last time, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, immediately to the south of the synagogue, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. In times of rising anti-semitism, this is something which is extremely sensitive and should never even has got this far. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Zubaida	David	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Porter	Deborah	I strongly object to this proposal for a 45 storey building in a conservation area. It would have a hugely negative impact on a building which has been there since the 18th century, Bevis Marks Synagogue is a Grade I listed building, a tourist attraction and a place of worship of enormous UK historic significance.	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Levene	Wendy	Strong objection to building a monstrosity blocking the oldest and most historical Synagogue in the UK. We are living in dreadful times with the Jewish people in this city and throughout the UK being persecuted. Bevis Marks is a beacon to education, history and tolerance with its magnificent history and priceless objects. Think carefully considering giving permission for an eyesore of a building! A huge ugly concrete structure that looms over a beautiful building it is an atrocity and disgrace!!! Do NOT allow this to happen!!	NO	Public Access website	16-Apr-24
24/00021/FULEIA	Walker	Anne	I am writing to express my opposition to the above-noted building application adjacent to Bevis Marks Synagogue. Bevis Marks Synagogue is a very special place. It is of profound historical and religious significance to London and to the rest of world, including Canada from where I submit these comments. Bevis Marks is the only synagogue to have provided continuous services for over 300 years. It is only one of two such buildings in the UK and Europe. It provides a safe spiritual home to many who have left London for the far reaches of the world. Like other historically significant structures in London, and elsewhere, is vital to preserve Bevis Marks in its undisturbed condition. This includes maintaining access to and use of its structures and surrounding spaces. The provision of security to its members cannot be compromised. The proposed demolition and construction of a non-descript office tower, of which there are plenty in London, may forever alter this historic place and compromise its function for the religious community. Even in Toronto Canada, buildings of historic, religious and cultural significance are given the dignity of space, of light, and of air. Thank you for your consideration of this response.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Phillips	gary	A 45 storey tower, only 25 metres away, would completely overwhelm the Bevis Marks synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. The synagogue has been in constant and continuous use since 1701. Gary Phillips	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Goldberg	Mira	The construction of a 45-storey tower next to a Grade 1 Listed synagogue raises concerns about overshadowing, loss of historic views, and disruption to religious rituals due to reduced daylight. The proposed building conflicts with conservation area regulations and lacks sufficient community benefits to outweigh its negative impacts.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Oakley	Melanie	Too impactful on the surrounding area. This should not be built as a high rise building.	NO	Public Access	17-Apr-24
24/00021/FULEIA	Halban	Peter	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	17-Apr-24

24/00021/FULEIA	Berger	Doreen	I object to this application as it will detract from the historic appearance and history of the area in and around Bevis Marks. The synagogue at Bevis Marks, established as long ago as 1701, and the oldest Jewish house of worship in the United Kingdom, is a particular point of interest to tourists, of whatever creed or religion, visiting the City of London. The building itself is the centre of communal affairs for the Sephardic community of London and important as a focal point for this Abrahamic religion., while welcoming visitors and tourists alike. There is a unique atmosphere of peace and tranquillity around its central courtyard. and its historic importance in the history of one of London's most established communities, and London itself, has always, been protected. The synagogue and surrounding area of Bevis Marks is indelibly part of the history of the Anglo-Jewish section of the population of London and, indeed part of the very fabric of London. Yet, although part of its past history, it plays an important part in the celebration of divergence of the present day. Its historic importance in the history of the City of London cannot in any way be overemphasised. The area around the Synagogue and its precincts should be protected to protect the history of the City of London itself. To do otherwise is to betray the City itself.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	ALPERT	MICHAEL	Dear Friends,I am once again sending a call to action for you to help us protect Bevis Marks Synagogue.Despite our successfully achieving a Conservation Area around Bevis Marks Synagogue just a few months ago, the City of London has now undermined our efforts and changed the goalposts which previously barred tall buildings in these protected areas.As a result, developers at 31 Bury St have now submitted a new application for a 45 storey tower, a negligible change from the 48 storey tower that was refused just two years ago. It fails to respect the immense heritage of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre.We therefore need to you to strongly object, and to do so without delay. We encourage you to use your own words and views, but provide you with a sample template below. You can also read this document for additional points.To submit your objection please follow this link.Thank you, ' Melody SalemChair, Bevis Marks Synagogue Heritage Foundation I'm writing to express my strong opposition to this new application (24/00021/FULEIA).I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area.This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year.The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light.What message would permitting this obscenity	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Shaw	Carole	A 43-storey building will dwarf and overshadow Bevis Marks Synagogue, a heritage site and listed building, with many overseas visitors. A previous application for a 48-storey building was rejected two years ago. So should this be.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Har-Zion	Shay	Will affect badly the existence and activities taking place in the Synagogue	NO	Public Access	17-Apr-24
24/00021/FULEIA	Urazovskaya	Liana	Jews arrived to London in 1651 and lived in City of London . However, a lot of changed since then and the only reminder of Jews on the area is Bevis Mark Sunagogue , which is building of historic and cultural significance. The request for 45 building nearby is not acceptable. I would not imaging that approval could be granted for this project near Westminster Abbey or St Paul's cathedral, so why is the synagogue not afforded the same protection?It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.I would appreciate it if you could consider to leave this area untouchable.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Costa	E	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Steinberg	Jonathan	Terrible shame to erect this building next to such a historic and important synagogue as Bevis Marks. It will drown out the light and the building in general	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Jarolimkova	Vita	I believe the tall building should not be built next to a Grade I listed synagogue. It will significantly impair the ability of the local Jewish community to practice their faith and detract from a historical, over 300 years old, monument. The developer significantly overestimates the positive benefit of their proposed construction, any residential building in Canary Wharf has the same features and the proposal therefore barely meets the expectations of current residential buildings. The benefit of building the proposed structure is outweighed by its negative impact on the integrity of the synagogue and its surroundings.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	bright	georgina	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Brower	Danny	At a time of high antisemitism the City of London should be promoting its history of tolerance and acceptance of Jews instead of blocking its multicultural heritage. The City of London would not permit such an application next to St Paul's cathedral. It should not allow it next to the most culturally significant and historic Jewish site in the City of London either. City of London can decide whether it wishes to alienate its Jewish residents. Ultimately Jews can decide to move our residences and businesses out of the City of London should City of London disregard our firm objections.	NO	Public Access website	17-Apr-24

24/00021/FULEIA	Levi	Ron	I find it alarming that so soon after rejecting a similar application, due to the infringement of light on an incredibly important Jewish heritage site, that the planners are considering another Tower in the same spot. The huge outpouring of negative reaction to the previous applications should have convinced planners that the development of huge monstrous towers in this facility is neither endearing nor desired. There is an important piece of History which seems to be marginalized on the altar of more square footage. At the present time , there is no shortage of office space, the outlook looks even worse, why do you need to build more on one of the few truly historical areas of the city. Please reject this application once and for all time. Regards Ron Levi	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Rubens	Angela	Horrified to see this plan. Bevis Marks synagogue is the cathedral synagogue of the Jewish community.The proposed building will dwarf it and will take light from it. In any case this is a designated conservation area. King Charles is a king of all faiths and your proposal in no way reflects this sentiment. My hope is that you will not go ahead with this plan	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Perdomo	Pedro	You are going to alter the character of the synagogue by placing that huge building.	NO	Public Access	17-Apr-24
24/00021/FULEIA	Crollick	Avril	Bevis Marks Synagogue is a historic building of huge significance not just to the Sephardic Jewish community but to the general public as well. The proposed 45 storey building will block light and be an eyesore to an otherwise unique and beautiful religious site	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Ghnassia	Oliver	Bevis Marks Synagogue is the oldest continuously used synagogue in Britain, dating from 1701. It has enormous cultural significance, being in effect the cathedral church of Judaism. It is located in the City of London, where it has over the years suffered tall buildings being erected around it. However, the very important southern sky view remains unobstructed, enabling the moon and the stars to be viewed from the courtyard. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.	NO	Public Access website	17-Apr-24
24/00021/FULEIA	Sanford	Clive	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	18-Apr-24
24/00021/FULEIA	singer	laurence	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a strong supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Yours sincerely Laurence Singer 14 The Rose Walk Radlett Herts WD7 7JS	NO	Public Access website	18-Apr-24
24/00021/FULEIA	Abell	Grace	I'm not Jewish, however the global Jewish community has seen a great deal of persecution which has become more aggravated in recent months. Please let Bevis Marks synagogue have the sunlight and sky view it is accustomed to. If London truly is a global capital where people of all faiths and cultures are protected, the building of the tower next door would not be entertained. I doubt this would be considered to adjoin a cathedral, temple or mosque, so please don't do this to the synagogue, which will be loved far more than any glass fronted corporate tower. Many thanks.	NO	Public Access website	18-Apr-24
24/00021/FULEIA	Jackson	Judith	We are saddened to hear the planning application to build a very tall building very near to Bevis Marks synagogue, is being reconsidered. For all the reasons given before, it would be really serious if this happened. It is the oldest synagogue in London, not just a museum, but a living place of worship. The light coming into the building would be seriously restricted. The planning application apparently removed the height by just a few floors. The whole project will be seriously damaging to the Jewish community in London and it would be very sad to see this synagogue diminished. We do hope that you will carefully reconsider and not allow the application.	NO	Public Access website	18-Apr-24

24/00021/FULEIA	Jackson	Michael	If the application is approved the light coming into the Bevis Marks synagogue building and the courtyard will be further reduced from its already limited state. Bevis Marks synagogue is one of the most notable buildings in London and it is wrong to allow it to be treated with such neglect and disrespect. I strongly disapprove of the application and I hope that you will reject it.	NO	Public Access website	18-Apr-24
24/00021/FULEIA	Finkel	Mazaltob Ruth	The proposed building will severely impact Bevis Marks Synagogue, one of the oldest buildings in the city. The amount of light in the synagogue will be drastically reduced and the synagogue will be overlooked by the proposed building. It is outrageous that this is even being considered when a previous application was refused: a reduction of 3 storeys will not make a difference to the amount of light that will be affected. It fails to respect the immense heritage of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Sneader	Alex	Would affect nearby heritage site, Bevis Markes synagogue. Blocking light in and affecting surrounding ground	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Richards	David	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Skinazi	Karen E.	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm the president of the British and Irish Association for Jewish Studies and an associate professor of literature and culture at University of Bristol and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area. The synagogue is the most important Jewish site in the UK, and remarkably the only synagogue in the world in continuous use dating back to 1701. The new tower, to the synagogue's immediate south, puts this at risk and is not in keeping with the values or policies I would expect from the City of London and the UK. The new tower would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. The end result would be to further stretch an already challenging situation, making it increasingly difficult for the synagogue to continue to serve its primary function, that of a functioning synagogue. This puts at risk the immense intangible heritage remarkably preserved in this Spanish & Portuguese Jewish congregation, a surviving ancient religious tradition from centuries ago. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Green	Abigail	I am a Jewish historian who works extensively with the heritage sector. I previously gave evidence to the Planning and Transport committee when an earlier proposal for this site was made, and have subsequently drafted two reports (see details here https://jch.history.ox.ac.uk/article/our-work-bevis-marks). I am not paid for this work, which is time-consuming. The reason I do this is because I consider the attempt to construct a very tall building on this site to be an existential threat to the heritage value of Bevis Marks synagogue, which is not merely architectural but also communal and historic, intangible as well as tangible. I note that the City has admired the quality of my work on this issue, whilst ignoring it to all intents and purposes. This, to my mind, demonstrates a desire to pay lipservice only to the need to preserve Bevis Marks Synagogue as a living place of worship. It is a shocking state of affairs and, as someone whose family have worshipped here since it was built (and still do) I am very distressed. This is a very difficult time for British Jews and the government is keen to press ahead with a British Jewish heritage month - a course of action at odds with the City's support for the proposed building. In that context, i want to add that I am deeply concerned by the threat this proposal poses to community relations at a very sensitive time: it is in clear breach of the Public Service Equality Duty to preserve inter-community good relations.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Bennett	Michael	I am a regular attendee at Bevis Marks Synagogue & I objected to the planning application to develop a tall building at Bury Street which took away much of the light from the Synagogue. The application was rejected & a new application has been made for the same site which is marginally lower in height than the original application but is largely the same so my grounds for objection are unchanged. The planners granted a conservation area in rejecting the original application & this protected the Synagogue & it would that the benefits derived from this are now being taken away. Bevis Marks Synagogue has a 300 year + history & this should be respected.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Copitch	Cyril	This application has already been rejected and now it has been submitted again the reasons for the injection in the first place has not changed I find it very upsetting that thing of beauty and Importance to the community and the history of Great Britain it being damaged by this application	NO	Public Access website	19-Apr-24

24/00021/FULEIA	Richards	Mark	Dear Sirs I'm writing to express my strong opposition to this new application (24/00021/FULEIA). After the original plans were rejected, quite rightly, this new application represents exactly the same issues as the original and should be strongly refused. This site is of huge historical interest to London's Jewish community and this application represents a clear and obvious threat, especially after the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower is yet another hideous monstrosity that only serves to crowd the skyline and produce more office space that is likely to stay empty with more and more people working from home. The tower to the synagogue's immediate south, would dominate the PROTECTED setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Blume	Dame Hilary	the proposed development adversely affects Bevis Marks Synagogue, and as such it shows little regard to the contribution made by the Jewish community to the City of London.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	LEVY	JOHN	I write to voice my vehement opposition to this "new" application . I am a supporter of Bevis Marks Synagogue and am appalled to see this proposal, especially after it's refusal two years ago and the recent adoption of the Creechurch Conservation Area. This "new" application is a slight "rehash" of the one previously submitted and is not in keeping with the conservation of a Grade 1 listed building which is now also in a conservation area. It is also the most important site of Jewish history in the UK and a Heritage and Education visitor centre is due to open later this year. The new tower, to the synagogue's south would dominate the protected setting and block the religiously important southern view. It would overshadow the synagogue and it's courtyard dramatically reducing it's light. Approval of this scheme would simply reinforce the impression that The City of London is more concerned about another monolithic tower block (and the accompanying income) than preserving the history around this magnificent Jewish synagogue. Using the analysis of David Baddiel - would such an application be made if it was adjoining St Pauls Cathedral? No I don't think so either. I trust you will make the only sensible decision and reject this application.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Eshel	Rosemary	Our family has long been members of the Spanish & Portuguese Congregation connected to Bevis Marks for several generations I feel strongly that the proposal to build a 45-storey tower would very much overwhelm the synagogue which has much historic and cultural significance. . Bevis Marks is a vibrant functioning synagogue with a large congregation who use both the inside & outside courtyard areas. The plan to erect such a tall tower would reduce considerably the function and use of the courtyard for rituals, functions and community cerebrations. It is inconconceivable that such a project would not take into account the historic significance of this important building and plan to dwarf it by the current proposal.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	King	Albert	Awful. It will severely affect the Bevis Marks Synagogue, a building of national importance	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Joory	Joy	I am writing to express my strong opposition to this new application (24/00021/FULEIA). I am a strong supporter of Bevis Marks Synagogue. I am appalled to see this new proposal, especially after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	TREUHERZ i	Francis	I hope that you will not permit the proposed new building to be constructed and so please preserve the life of the beautiful historic synagogue. I suggest that you visit the synagogue for a sabbath or festival service and see for yourself how the service is conducted. Thank you.	NO	Public Access website	19-Apr-24

24/00021/FULEIA	Gold	Jeffrey and Bonita	Planning application reference: 24/00021/FULEIA. I wish to object to the above planning application on the following grounds: - It will have an extremely damaging impact on the Bevis Marks Synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. Grade 1 listing affords protection to such buildings not only as regards their physical integrity but should also preserve their setting. In this case both the synagogue and its courtyard would be overwhelmed and its setting irreparably harmed - The proposed new building will destroy the view of the southern sky view. This is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. - Both the synagogue and its courtyard would be overshadowed for much of the day, reducing the useability of the courtyard including for rituals and celebrations. - The proposed new building would further reduce the little daylight currently penetrating into the synagogue, The proposed new building would make it even worse - it would be more difficult to conduct worship and other activities. It should also be appreciated that, due to the historic nature of the synagogue, installing additional electric lighting is not feasible. - The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, and the current external appearances and settings of the buildings should likewise be protected. - The proposed building will be detrimental to the setting of other heritage assets in the local area, and will therefore offend against the qualities of the Conservation Area as a whole. The above factors are reinforced by the following; - - It seems highly unlikely that a building such as that proposed would be allowed next to St Paul's Cathedral - such an historic synagogue sh	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Brooks Evans	Michelle	If built the tower will cause great damage to Bevis Marks synagogue's protected setting, internal light levels, and the community's ability to worship by blotting out its southern exposure sky-view.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Gomes da Costa	Diana	I strongly object to application 24/00021/FULEIA for the following reasons: 1) It violates the newly adopted Creechurch Conservation Area as it threatens the conservation of a Grade 1 listed building, namely Bevis Marks Synagogue. 2) Two years ago a similar application was rightly rejected on the grounds that it would deny the Synagogue and its courtyard, of necessary light. Application 24/00021/FULEIA would do the same, if it is allowed to succeed. 3) Bevis Marks Synagogue is the oldest Synagogue and the most important Jewish site in the UK. It has held Services consistently since its foundation in 1701 and is still a most popular venue for weddings and other notable events. 4) The Synagogue is also a popular destination for tourists and a new Heritage and Education Visitor Centre will soon be opening its doors, potentially likely to attract more visitors, which is certainly to the benefit of the City of London and in particular to other nearby tourist attractions and businesses, such as restaurants. The possibility of a new structure, over-shadowing the Synagogue and the new Visitor Centre, will undoubtedly mar the experience of sightseers, who visit from the UK as well as from all parts of the world. 5) Bevis Marks Synagogue is the only non-Christian place of worship in the City of London. This raises the question as to whether if a similar planning application to 24/00021/FULEIA, were made adjacent to St. Paul's Cathedral, would be acceptable. In conclusion, the City of London has over many years rightly rejected previous ill-conceived planning applications which threatened the existence of the Jewish Community's most treasured possession, namely Bevis Marks Synagogue. Hopefully, planning application 24/00021/FULEIA will be similarly and decisively vetoed as furthermore, agreement would contravene the City of London's own conservation plans for the Creechurch Area of the City.	NO	Public Access website	19-Apr-24
24/00021/FULEIA	Page	Anne	Too many tall office buildings in the City already. Demolition bad for the environment. Damage to the surrounds of the newly refurbished and mighty ancient synagogue. Don't do it.	NO	Public Access website	20-Apr-24
24/00021/FULEIA	Carver	Shirlee	I strongly object to this new development as it means Bevis Marks Synagogue will be obstructed by the tall buildings and it is the oldest synagogue in the UK (constructed in 1701) as well as being a beautiful place of worship and a safe haven for people practising their religion. The synagogue is also a heritage site and a famous landmark too and many people flock to see it, especially tourists from around the world. Why would any construction firm choose to develop tall tower buildings so close to a famous heritage site?? It would be a tragedy if this development was allowed to go ahead. This is the second time this Synagogue has been in the firing line. Pick a DIFFERENT location!!!	NO	Public Access website	20-Apr-24
24/00021/FULEIA	Smilg	Jeremy	Please reconsider this. 1) It will dominate the area. 2) It is not needed. 3) Building it will cause vast local disruption. 4) Many of the existing office buildings already in the City will be left vacant. 5) Architecturally, it is hideous,	NO	Public Access website	21-Apr-24
24/00021/FULEIA	Stein	Janis	It fails to respect the immense heritage of Bevis Marks Synagogue.	NO	Public Access	21-Apr-24
24/00021/FULEIA	Stewart	Rosalind	It will spoil the heritage and outlook of the very historic Bevis Marks Synagogue.	NO	Public Access	21-Apr-24
24/00021/FULEIA	Coelho	Jane	Please do not allow a tall building to be built that will block the light of the historic and culturally significant religious Bevis Marks. No. We do not need another looming structure.	NO	Public Access website	21-Apr-24
24/00021/FULEIA	Franks	Joanna	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	21-Apr-24

24/00021/FULEIA	Ronish	Yarema	Please see objection submitted by email on 21 April 2024, as this form did not allow sufficient length to address the relevant issues. My wife and I are full-time residents of Aldgate Ward and Freemen, the City is our full time home. Briefly, this application should be rejected due to: 1) Harm to setting listed buildings 2) Harm to conservation area and streetscape 3) Lack of public benefit 4) Errors in the Daylighting analysis, as well as unacceptable effect on residential daylighting. In addition, the residents of 4-8 Creechurch Lane were not invited to the June 2023 Public Exhibition as was claimed.	NO	Public Access website	21-Apr-24
24/00021/FULEIA	Franks	Joanna	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. Jo Franks	NO	Public Access website	22-Apr-24
24/00021/FULEIA	Grubin	Donald	It's hard to believe that yet again an attempt is being made to erect an imposing building that threatens Bevis Marks Syngagogue, especially as since the last proposal was rejected a conservation area was established in the area in whch the Synagogue sits. The effect on this Grade 1 listed building will be to dominate it and its courtyard. Given that a very similar proposal was rejected just a couple of years ago I urge you to reject this one as well.	NO	Public Access website	22-Apr-24
24/00021/FULEIA	Pilo	Jacquelynne	Please do not allow the Bevis Marks Synagogue to be overshadowed by this development. The Bevis Marks is historically significant. It is British Jewry's Cathedral synagogue and is used and visited by people from all over the world. Don't let this beautiful site be diminished. This kind of proposal would never be considered if it was in the vicinity of St Paul's Cathedral. Thank you Jacquelynne Pilo Boynton Beach Florida, USA.	NO	Public Access website	22-Apr-24
24/00021/FULEIA	Black	Pat	This proposed development is totally unacceptable given the impact it will have on Bevis Marks Synagogue. The development proposed in 2020 was rightly refused planning permission. This new application should be refused for the same reasons. It is too tall and will overshadow the synagogue, which is a Grade 1 listed building of great historical, cultural, and religious significance being the most important Jewish site in the UK. In particular, the new building will destroy the southern sky view which is an important part of the setting of the synagogue. The developers state that the new development will have many benefits for the community which, even if true, does not justify the harm which will be done to the synagogue. This development is in the Creechurch Conservation Area, this alone should be sufficient for the application to be refused. A development like this would not be permitted close to St Paul's Cathedral and should not be permitted here.	NO	Public Access website	22-Apr-24
24/00021/FULEIA	GARCIA	Nicola	My objection to this is that once again the building of an extremely high rise block is being proposed that would block out light in the oldest continuously active place of Jewish worship in this country and the only synoagogue in the square mile. It is the cathedral synagogue of Great Britain and as such should be treated with the same respect as St Paul's Cathedral. Nobody would contemplate such a plan in the immediate environs of the Cathedral. I was married at Bevis Marks as were my ancestors and my husband's ancestors and now my son had his wedding ceremony there; his wife's family from Italy have also had connections to Bevis Marks going back to the 18th century. Whilst ours is a personal connection, it is a story of migration and settlement that must not be lost. Given the City of London's clear sensitivity to the heritage of others, why is the Jewish community not being afforded the same treatment? More importantly, a plan that was extremely similar to this was rejected and in the intervening time the Creechurch conservation area has been established so how is this proposal even on the table? Current planning policy is prohibits the construction of new tall buildings in conservation areas, so there is a direct conflict with the statutory development plan; this tower would compromise the qualities not only of Bevis Marks but of the whole Conservation Area.	NO	Public Access website	22-Apr-24
24/00021/FULEIA	Courtney	Yvonne	The whole premise of the proposal is that of greed. From five floors to 43, is an 800% increase in height - in a conservation area. Even the addition to Holland House is appalling - in the name of extracting as much potential floor space as possible, to maximise profit. The current rooftop area is perfect as it is, especially considering that it is a much loved listed building. Any addition destroys that. The scheme overscales everything surrounding it, in a dense, tightly woven urban fabric which is not what one has at the Gherkin or at Creechurch Place. Those two tall buildings are surrounded by space. The area at Creechurch Lane and Bury Street has no space around it. So increasing the existing height by four to twenty floors would seem a more appropriate scale of development than a New York 'pencil tower'. With a historic church and synagogue less than 100m away, it seems arrogant to suggest a skyscraper would be appropriate. I am surprised that this scheme has got to this point and must have had officer support to be submitted for planning. We as residents have been left out of any consultations. We therefore don't trust the cloak and dagger approach of the planning application, and are surprised and disappointed that the City of London Corporation would support such a scheme.	NO	Public Access website	22-Apr-24
24/00021/FULEIA	Sale	Anabel Unity	If the construction of this building went ahead it would significantly and negatively damage the Bevis Marks synagogue, which has stood unfettered for centuries as an important global symbol of British Jewry. The proposed building would significantly reduce the daylight in the synagogue, which relies on daylight and candlelight for its services. Previous proposals suggested the building would be 48 stories high and this proposal says it would be 43. This is still inappropriate because such a building would dominate the landscape, overshadowing Bevin Marks and its historical importance to British Jews and others. The construction of the building would also disrupt the religious lives of those who use the synagogue. Such a proposal would not be made for next to St Paul's Cathedral for the reasons stated above. It should be rejected and the land around Bevis Marks protected against building tower blocks.	NO	Public Access website	23-Apr-24

24/00021/FULEIA	Harris	John	As a now retired City Worker I am very familiar with the Bevis Marks area and the encroachment it has suffered from nearby developments in recent years. The persistent climate of development in the City does not reflect a need for accommodation or retail space it only seeks to enrich the developer at the expense of the historic fabric of the Cty of London. The time has come for a stand by local and national planners to prevent further unnecessary development in sensitive areas. For context in this time of heightened religious tension you should note I am an atheist so not partisan in this matter; my objection is untainted by bias.	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Burstin	Stephen	Thank you for the opportunity of commenting, indeed objecting vociferously, to what will not only be a true blight on the area but a total disregard for the glaring detrimental effects this proposal will have on the oldest, most revered place of Jewish worship in this country, . I conduct walking tours several times a week of the Old Jewish Quarter and include Bevis Marks Synagogue as a stop-off when I relate its enthralling story and links to famous historic figures. I have on each tour mentioned the current planning threat to Bevis Marks and without exception my clients, Jewish and non-Jewish Londoners alike, have been appalled by the proposal and its indisputable negative consequences. On behalf of these hundreds of objectors I have met (and myself) I urge you to turn down once again what would not only be a travesty for the synagogue and the area generally but also what would be seen as a shameful act by society today (especially its authorities) in the eyes of tomorrow's generations.	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Othen	Gillian M		N/A	Email (attached in DC- received by email file)	23-Apr-24
24/00021/FULEIA	Rees	Alison	It would be completely wrong to allow a 45 storey tower, when a 48 storey tower was refused just two years ago. It fails to respect the immense heritage of the synagogue site and would have a disastrous impact on the Grade 1 listed building which is Bevis Marks Synagogue - a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre. This project would destroy the sky view as well as overshadow the synagogue courtyard, impacting significantly on the light within the synagogue. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so neeeds to be rejected as there is a direct conflict with the statutory development plan.	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Coleman	Brian	I am the former London Assembly Member for Barnet and Camden and represented the largest number of Jewish voters in the United Kingdom. Please will the City Corporation see sense and stop this proposed development which will have severe detrimental effects on the Bevis Marks Synagogue which as you know is the oldest Synagogue in the United Kingdom . The proposed development will overshadow the Synagogue which will lose natural light. Further the proposed building has no architectural merit and the developers just must do better in order to justify the damage to Anglo Jewry heritage.	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Carson	Steven	Objection on the same grounds as we're put made with the previous application which was refused. Mayor Saddiq Khans bias should not influence this decision	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Denham	J	I strongly object to this application - It will impact negatively on the new Creechurch Conservation Area designated by the City of London earlier this year. This unnecessary multi-story office block will overshadow & decimate the daylight / sunlight on neighbouring buildings most notably the grade 1 listed Bevis Marks Synagogue where natural light is vital. It will also impact negatively on the nearby Tower of London World Heritage Site.	NO	Public Access website	23-Apr-24
24/00021/FULEIA	Jeffrey	Robin	This is a historical building of the first importance, its position and function should not be compromised in any way. Bevis Marks is centrally important to the history of the Jews in this country, but also more broadly to our tradition of religious tolerance, dating back to the reign of Charles II. This proposal shows a grotesque disregard for the history of London, our country and our diverse society. It should not be considered for a moment.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	jackson	claire	My family are members of Bevis Marks synagogue and it is a beautiful space within, with of course a magnificent history and heritage. It is important to preserve its setting as well as its interior so new buildings erected to obscure what remains of its outlook would be disastrous. Apart from the need to protect Bevis Marks, wouldn't it be much better to keep the height of as many new buildings as possible modest in scale? We are not New York, we all need to breathe and to be in harmony with our surroundings. We have sufficient high rise, ugly buildings. Let's stop thinking profit profit profit. Let's just stop building high rise altogether.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Mann	Alan	I regularly visit this area of London, and marvel at the wonderful Bevis Marks Synagogue which is an historical landmark not just in London, but for the history of the Jewish community in England, and their place in the growth of the City of London. The construction of such a tall building will destroy the context in which this synagogue sits, and is completely inappropriate for this area. I object strongly that commercial profit is being put before historical heritage, and would ask that this application be rejected by the City of London.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Baharier	Linda		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Topper	Amelia	Nuisance and disruption to our synagogue and failure to recognise and value the cultural significance of Bevis Marks and its importance to the Jewish people. In a time such as this, it is more important than ever to respect and protect the Jewish community, their landmarks and to appreciate their contributions to British society. This development threatens to damage the legacy of this synagogue which poses as a cultural and historical landmark, giving people a place to appreciate Judaism in central London. It is the only building of its kind, and is among many other religious establishments for other organised religions in Central London. Jewish people deserve their religion to be represented safety as much as anyone else.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Schonfield	Amos		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Burstin	Stephen	Thank you for the opportunity of commenting, indeed objecting vociferously, to what will not only be a true blight on the area but a total disregard for the glaring detrimental effects this proposal will have on the oldest, most revered place of Jewish worship in this country, Bevis Marks Synagogue. I conduct walking tours several times a week of the Old Jewish Quarter and include Bevis Marks as a stop-off when I relate its enthralling story and close links to famous historic figures. I have on each occasion mentioned the current planning threat to Bevis Marks and without exception my clients, Jewish and non-Jewish Londoners alike, have been appalled by the proposal and its indisputable negative consequences. On behalf of these hundreds of objectors I have met (and myself) I urge you to turn down once again what would not only be a travesty for the synagogue and the area generally but also what would be seen as a shameful act committed by today's society (especially its authorities) in the eyes of tomorrow's generations. Stephen Burstin. Jewish London Walking Tours	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Solomons	Jonathan		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Shupak	Harold		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Dobson	Owen	This monstrous construction would utterly dwarf and overshadow Bevin Marks Synagogue, one of the most significant historic buildings in the city, and indeed, the country. It would be an astonishingly insensitive act even in this age of rampant iconoclasm.	NO	Public Access website	24-Apr-24

24/00021/FULEIA	Fox	Vicki		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Moreland	Lee S		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Simon	Barbara		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Ward	Kevin	There are too many tall buildings already which detract from the amenities of these sorts of buildings. This synagogue is a jewel in the crown of all our shared history and a beautiful cathedral of the Jewish faith. We must seek to preserve it and the integrity of its surroundings. To fail to do that is to fail the people and those who worship here.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Comaroff	John		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Rubens	Fiona	This will adversely affect Bevis marks- a home from home for many Jewish people in this country. It is an affront to their light as well as being an eyesore for the synagogue. Does the city of London need another tower block when people are WFH? This proposal will completely blight the area as well as affect the sacred space that is bevis marks. This synagogue has fought many battles about building applications. When is it time to stop and respect the history of this building? It would never happen if this was a church or mosque. An utter disgrace that this application keeps being tweaked then resumitted. It's time to put this historic building first as opposed to such a soulless proposal. Stop this application.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Rubin	Miri		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Schmool	Marlena		N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Inglesant	Philip	Bevis Marks is a building of enormous cultural significance not only to the Jewish community but to the whole of London. It has a particular importance to the Sephardic Jews, the first community to return to England after their 1290 expulsion, at first covertly and then openly under Oliver Cromwell. I am not Jewish but I recognise this very special place this has in the history of our country. Already surrounded by high buildings, its character would be very detrimentally affected by this proposal, which would block the all-important southern light. It is unconscionable that this proposal is being considered when another similar one was already rejected in 2020.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	PNatali			N/A	Email (attached in DC- received by email file)	24-Apr-24
24/00021/FULEIA	Gulland	Yvette	There was a planning proposal which was heavily objected several years ago because it would block the view of the heavens and would created such a heavy impact on the nature of this very important holy and religious building This new proposal follows a similar line of determined overshadowing and monstrosity and is very cheeky but we have not forgotten the last one which received more objections than the council had ever received and was Her thrown out	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Simmons	David	The space of this ancient synagogue must be protected and not invaded by developments designed purely for financial gain.	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Matthews	Stephen	I am at a loss to understand how this application can be considered. A massive slab which will be visually intrusive and will overlook and block light from this famous synagogue. I sincerely hope that the City Councillors will not take away the prevention of high rise offices in conservation areas. With working from home being so prevalent nowadays would there be sufficient demand for any resulting offices? For the sake of the environment a total refurbishment and extension of the existing building should be the way forward, encompassing the two other buildings mentioned in the application. Please refuse permission for this application!	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Walden	Kiri	The proposed development will damage the setting of the historic and culturally important Bevis Marks Synagogue. The height and style if the building impose yet another threat to the historic integrity of what little remains in the area, looming over the synagogue and many other vulnerable and important historic buildings in the vicinity	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Sawyer	Jenny	The City doesn't need this tower. The changes in real estate since the pandemic means its a white elephant. The fact it will overshadowed a Synagogue that Oliver Cromwell allowed is even more shocking. The City needs to remember its history as well as its future Jenny Sawyer, City of London Guide	NO	Public Access website	24-Apr-24
24/00021/FULEIA	Levine	Stuart	I have been attending Bevis Marks synagogue for over 35 years. After prayers we tend to congregate in the courtyard with sky views. The thought of a huge building being built shadowing the synagogue is extremely distressing to the community especially in the times we are now in this is another nail in the coffin for the Jewish religion! Totally unacceptable and not needed.	NO	Public Access website	25-Apr-24
24/00021/FULEIA	de Pass	Jonathan	I'm a supporter of Bevis Marks Synagogue and write to object to the new planning application (24/00021/FULEIA) which, if passed, would allow for the construction of a modern tower causing immense damage to the setting of such an important and historic building. This new application is a cynical proposal coming so soon after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area and I strongly oppose it. It is clear that this new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. Other culturally important and historic buildings within the City of London, e.g. St Paul's Cathedral, have been protected in their immediate vicinity from insensitive developments. Why should Bevis Marks Synagogue, which is of equal cultural and religious significance to the Jewish Community in the UK and worldwide, not receive the same consideration? Please refuse this application. It is an abomination.	NO	Public Access website	25-Apr-24
24/00021/FULEIA	Sneader	Graham	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. I work in St Mary Axe. The creation of more potentially unlet office space does not justify spoiling historic views across the square mile.	NO	Public Access website	25-Apr-24
24/00021/FULEIA	Lawrence	NIgel	This proposal will have a determental impact on one of London's oldest synagogues . Like other proposals for the area it should be blocked and further planning for areas in this building declined of they will effect a the Bevis Marks Synagogue. This part of London has enough high rise buildings -	NO	Public Access website	25-Apr-24

24/00021/FULEIA	Baskin	Usevalad	I am writing to express my deep concern and opposition regarding the new application (24/00021/FULEIA), which threatens the cultural and historical significance of Bevis Marks Synagogue, a Grade-I listed building in the recently established Creechurch Conservation Area. As a nearby resident and frequent visitor to the synagogue, I am appalled by this proposal, especially given its previous refusal. The planned 45-storey tower, towering over the synagogue to the south, would dominate and cast a shadow over this sacred site, blocking the religiously significant southern sky view. The development would compromise the limited natural light in the synagogue, impacting worship and rituals. It is unthinkable that such a proposal would be considered near St. Paul's Cathedral, and yet, here we are, risking the integrity of a site that is the very heart of British Jewry. The tower's proximity would overwhelm the synagogue, sending a troubling message to the hundreds of thousands of visitors expected at the upcoming Heritage Centre. The City of London must uphold its values and protect this cherished landmark. I urge you to reject this application and prioritize the preservation of our cultural heritage. Yours sincerely, Usevalad Baskin 701 Satin House E1 8PW	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Morganstein	Stuart	We are members of Bevis Marks Synagogue and cannot believe we have to write again to express our strong opposition to this application. It was turned down two years ago and this new application is just three storeys lower and is now adjacent to a conservation area. The new tower would overshadow the setting of the Synagogue and its courtyard, in the same way as the previous rejected building. We feel that this sort of building would never be allowed in the vicinity of St. Paul's Cathedral and should not be allowed adjacent to such an important Grade I listed building, of particular importance to British Jewry and internationally. Carole and Stuart Morganstein	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Gauthier	Charlotte	I strongly oppose the wrongheaded development proposed in this application. As an historian who works with heritage buildings, I am concerned that the proposed development would damage the setting not only of Bevis Marks Synagogue, but of other heritage buildings in the area. Bevis Marks is a Grade I Listed building of enormous historic and cultural significance. The proposed development would overshadow the Synagogue courtyard and destroy the southern sky view from inside, which would negatively affect the worship of the congregation as well as materially diminishing the amenity for everyone who came to see the Synagogue out of historical interest. The proposal also contradicts two of the Corporation's stated policies: 1. The City of London is rightly focused on 'green' and sustainable building. 31 Bury Street is only 40 years old and is capable of being refitted for continued use. Unnecessary demolition is the antithesis of 'green' and sustainable therefore, and would simply squander the energy already embodied in the building. 2. There is presently - and most properly! - a ban on tall buildings in Conservation Areas. The development site is within the Creechurch Conservation Area, so development of a tall building on that site is in direct conflict with the statutory development plan. This proposal and all further proposals for development of tall buildings in the Creechurch Conservation Area should be rejected.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Ward	James	ct Bevis Marks Menu THE NEW THREAT TO BEVIS MARKS SYNAGOGUE A CALL FOR WIDESPREAD OBJECTION For the second time, the synagogue is under threat. Bevis Marks Synagogue is the oldest continuously used synagogue in Britain, dating from 1701. It has enormous cultural significance, being in effect the cathedral church of Judaism. It is located in the City of London, where it has over the years suffered tall buildings being erected around it. However, the very important southern sky view remains unobstructed, enabling the moon and the stars to be viewed from the courtyard. In 2020, a 48 storey office building was proposed just 25 metres away at 31 Bury Street. After a worldwide campaign which generated more objections that the City Corporation has ever experienced before, the Corporation refused permission in 2022, primarily because of the unacceptable impact on the synagogue. The developers are audaciously trying again. Tireless work by the Synagogue community has led to the area now being designated as a Conservation Area. However, the City Corporation has given with one hand and is taking away with the other - it is proposing to scrap the ban on tall buildings in Conservation Areas and indications are that the leadership is now supportive of the proposed building. We therefore need even more people to join the campaign to defeat this latest attempt. WHAT YOU CAN DO	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Sondack	Julia	The above property is of significant importance to the Jewish community and history of London and the UK. I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm of the UK Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	26-Apr-24

24/00021/FULEIA	Naar	John	My family have been members of Bevis Marks since the 1840s. It is with great pride that the Synagogue, which has Cathedral status in the UK, has remaineds relatively unchanged since it was built. To have a tower block erected to the south of the building will overpower to building. Attempts have been made in the past which have been rejected. St Pauls Cathedral has its aspect controlled in all directions from miles away yet Bevis Marks, built some 25 years later seems to be fair game for developers. This intrusion should be stopped.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Schonfield	Jeremy	I have attended Bevis Marks Synagogue each week for prayers since the early 1980s, and vigorously object to the proposed plan. Having recently rejected a similar plan, and established a conservation area around the synagogue, the planning office should not have agreed to consider a similar project, unless it is intended slowly to wear down the synagogue and its defenders, and to waste the resources that should be directed to more worthwhile issues. The plan should not, in my view, have been considered by the authorities, and it was wrong to present it to the public for consideration. There are several clear reasons for rejecting it. The construction will generate dust, posing environmental and health issues; it will cause vibration that could damage the delicate fabric; it will make noise that will disrupt worship; the proposed building will throw a deep shadow over the synagogue, blocking the sunlight that sometimes lights the interior. It will also permanently shield the view of the sky, and prevent the recital of the monthly prayers over the new moon, an ancient ritual that it has always been possible to perform at the synagogue. It is more than doubtful whether the City needs additional office space at the moment, making this a particularly speculative development. A conservation area, to be meaningful, should protect this unique building from encroachment by new constructions. Because Britain was not invaded in 1939-45 (Nazi invasion halted Jewish worship everywhere it was established), the synagogue is the only one in Europe of its period to remain in uninterrupted use, so is of international importance, besides being the oldest working synagogue in the UK. If the plan were approved, it would raise serious questions about the attitude of the City of London to its role in Jewish history in the early-modern period, which is to be reflected in the visitors' centre which will be opened there in the coming months.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Ridler	Katharine	I strongly oppose this new application (24/00021/FULEIA). I support Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its closely similar predecessor was refused two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK, and the Heritage and Education Visitor Centre which is due to open later this year. The proposed new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this grossly overblown proposal send about the City of London and its values to the hundreds of thousands of visitors, including schoolchildren and those from across the UK and overseas, who will come to visit over the next years? A terrible message. Many City offices stand empty already: this vastly over-sized new one is not needed at all. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Dingle	Barbara	As a Christian with a great appreciation of our Jewish community and Jewish culture in the UK and particularly in London, I'm writing to oppose in the strongest possible way application (24/00021/FULEIA). This new application, which seems hardly changed since it was last submitted, is surely not suitable so near to a conservation area including this most beautiful and historic Grade-1 listed synagogue. It is a very important Jewish site which I have been honoured to visit on a number of occasions including last year when the Archbishop of Canterbury was interviewed there. Yes, many in the Christian community appreciate and greatly enjoy visiting this synagogue. The proposed new 43 storey tower would utterly dominate the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its attractive courtyard. I urge you to refuse this application as you did with the previous attempt. Thank you.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Amado	Jozef Ercevik	I have been attending services at Bevis Marks' for the last 10 years. As a separdic Jew it is a land mark a safe heaven and reminder of Jews coming to uk for the first time. It is very essential for London to preserve the history.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Waller	Suzanne	It would be most unreasonable for one small building to be completely surrounded by high-rise blocks.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Lewis	Rebecca	I object to this development for the following reasons: Overbearing Will significantly reduce the natural light into the synagogue	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Bernstein	Antony	I think that this is an appalling proposal. I object to it as the proposal is overbearing and crucially will block out too much light required by Bevis Marks synagogue.	NO	Public Access website	26-Apr-24
24/00021/FULEIA	Kindelan	Adam	Why is there such a furore over sunlight? Bevis Marks synagogue is in such a built-up area that this tower would have less of an effect on it than, say, a few extra overcast days each year. (This is especially true since the proposal's redesign, which is shorter and more slender to minimise its shadow.) Refusing the skyscraper on such grounds would be no more reasonable than somehow outlawing clouds, or legislating for more daylight during winter months. I hope the City planners will approve the proposal on the basis of its design strengths, and ignore the objectors' exaggerations. Why is there such a furore over sunlight? Bevis Marks synagogue is in such a built-up area that this tower would have less of an effect on it than, say, a few extra overcast days each year. (This is especially true since the proposal's redesign, which is shorter and more slender to minimise its shadow.) Refusing the skyscraper on such grounds would be no more reasonable than somehow outlawing clouds, or legislating for additional daylight during winter months. I hope the City planners will approve the proposal on the basis of its design strengths, and ignore the objectors' exaggerations.	NO	Public Access website	27-Apr-24

24/00021/FULEIA	Richards	Paul	This plan will be extremely detrimental to the character of the historic Bevis Marks Synagogue, located immediately behind these plots. Bevis Marks is the oldest synagogue in London, and as such holds a critical significance in the history of London's Jewish heritage. The synagogue grounds also house the museum of Spanish and Portugese Jewry as well as being considered consecrated ground. I am quite sure that if this were a church or a mosque and not a synagogue, the planning application would not have been made in the first place, or would have been thrown out without any consideration! I trust the same will be true for the synagogue. Last year, a similar plan was rejected by your good selves, and this one is very close to that, with simply 4 floors less. This is making a complete joke of the process! This plot should be limited to a reasonable number of floors to allow the remaining area to continue operations as it has over the last hundreds of years! The synagogue in question has survived many challenges over that period, not least of which the blitz in WW2, and this plan will present new challenges with which it has not had to deal with, like excavation of 6-7 levels underground (including building foundations etc.) which potentially would lead to subsidence, putting the entire structure of the synagogue at risk (not to mention other buildings in the area)!! The other point to mention is that the area is already saturated with office blocks with plenty of empty room to rent, so there is no real commercial justification for creating more empty space!!	NO	Public Access website	28-Apr-24
24/00021/FULEIA	Richards	Guy	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral or any other church, nor indeed any of the multitude of mosques around the capital, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	28-Apr-24
24/00021/FULEIA	Shamash	Sue	I am writing to formally object to the planning permission application for the proposed 45-storey tower adjacent to Bevis Marks, a Grade 1 Listed building of profound historical and cultural significance. My objection is based on the following grounds: Historical and Cultural Significance: The towering presence of the proposed development would overwhelm the delicate ambiance of Bevis Marks, much like St Paul's Cathedral, yet it lacks commensurate protection. The juxtaposition of such a structure would diminish the integrity and significance of the synagogue. Impact on Sky View and Religious Rituals: The proposed tower's height would obstruct the southern sky view crucial to the religious rituals conducted at Bevis Marks, hindering observations of celestial movements integral to these practices. Contravention of Conservation Area Policy: The development site falls within the Creechurch Conservation Area, where current planning policy expressly prohibits the construction of tall buildings. The proposed tower represents a direct conflict with established statutory development plans. Doubtful Community Benefits: Claims of community benefits, such as the restoration of Holland House, fail to outweigh the irreversible harm to the synagogue and the broader Conservation Area. The proposed benefits lack substantive evidence and remain speculative. Squandering of Existing Resources: The proposed demolition of a structurally sound building, only 40 years old, represents a wasteful disregard for embodied energy and undermines sustainable development principles. Compromise of Heritage Assets: The proposed tower would compromise the setting of other heritage assets in the local area, detracting from the historical character and charm of the Conservation Area. Lack of Expected Standards: The endorsement of the development by the City Corporation contradicts its purported recognition of the importance of Bevis Marks.	NO	Public Access website	28-Apr-24
24/00021/FULEIA	Petretti	Richard	I have just heard the news that a plan has been revived to build an oversize office tower adjacent to the Bevis Marks synagogue (See planning application reference: 24/00021/FULEIA). Please stop this terrible idea and reject the application. Bevis Marks is a Grade 1 Listed building of enormous historic and cultural significance to not only for England but for people around the world. A 45 story tower would completely overwhelm the synagogue which will destroy the southern sky view, which is an essential part of the setting of the synagogue and important for the intangible qualities it contributes to religious ritual. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place and at the wrong time. Inexplicably, the development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The developers argue they are providing lots of planning benefits that outweigh the harm to the synagogue. But of these - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community. Furthermore, the existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. The unnecessary demolition itself raises very serious concerns regarding potential impact upon the neighboring structures and the environment generally. The City Corporation is being disingenuous: claiming to recognize the importance of the synagogue and other nearby heritage assets, yet simultaneously facilitating this monstrous development in a Conservation Area. Please put an immediate stop to any application to build such an inappropriate structure adjacent to historic Bevis Marks.	NO	Public Access website	28-Apr-24
24/00021/FULEIA	Stock	Lisanne	I am writing to object to the proposed building as it will impose significantly on Bevis Marks Synagogue which is a historic and current place of prayer. The proposed height of the building will overshadow the synagogue which is a Grade 1 building of historic and architectural value. I do not think a building of this nature is appropriate given the impact it will have on this place of worship and even if certain safeguards have been point in place in the current proposal it continues to impact Bevis Marks and those in its community.	NO	Public Access website	29-Apr-24

24/00021/FULEIA	Langner	Lola	I have just heard the news that a plan has been revived to build an oversize office tower adjacent to the Bevis Marks synagogue (See planning application reference: 24/00021/FULEIA). Please stop this terrible idea and reject the application. My great, great, great grandfather, David de Aaron DeSola, was a distinguished Rabbi at Bevis Marks from 1818 on. Bevis Marks in England was a beacon for Sephardic Jews and afforded us the safety we had been denied for hundreds of years. We still consider Bevis Marks a pivotal location in our family migration from Portugal (where many family members were killed in the Inquisition), to Amsterdam and then to England. Indeed, my husband and I regularly donate to Bevis Marks (though we live 8000 miles away), because Bevis Marks matters so much to us. Bevis Marks is a Grade 1 Listed building of enormous historic and cultural significance to not only for England but for people around the world. A 45 story tower would completely overwhelm the synagogue. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked forever. The development site is within the Creechurch Conservation Area. The proposed building would also damage the setting of other heritage assets in the local area compromising the qualities of the Conservation Area as a whole. The City Corporation is being disingenuous: claiming to recognize the importance of the synagogue, yet simultaneously facilitating this monstrous development in a Conservation Area. We expect much higher standards from Britain's most prestigious local authority. Please put an immediate stop to this or any other application to build such an enormous and inappropriate structure adjacent to the historic Bevis Marks synagogue.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Eskenzi	Yvonne	The building of this substantial nature will totally overshadow this building causing loss of light, towering over the building. This is a 46 storey building with the basement which is like having an ancient Ewe tree expecting to survive in the shadows of a jungle being planted of eucalyptus trees sucking the life of everything around drip of water and light around it. It will suffocate its neighbouring buildings.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Gritzman	Jeffrey	Dear Anna Tastsoglou I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. I've visited a number of European cities such as Prague, Amsterdam and Seville where their best examples of Sefardi synagogues are prized and valued for their importance to Jewish and their city culture. It would be nice to think that London with its claims to be truly multicultural could do the same. This new application, barely changed since the last time it and takes no account of Bevis Marks being the most important Jewish site in the UK. Additionally and Heritage and Education Visitor Centre which is due to open later this year deserves highlighting NOT overshadowing! The Jewish connection and contribution to the City and into the east end of London is worthy of promotion and a physical overwhelming of the building sends out the wrong message. This proposal would not be acceptable next St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's most important religious building. I urge you to refuse this application. Regards Jeffrey Fritzmsn	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Dreyfuss	John	The development will distroy a view of a listed building and also overwhelm the synaguogue.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Edwards	Matthew	The City of London is a thriving commercial and leisure hub for London and I wholeheartedly support the addition of new floor space. A modern building will have a positive impact on the environment locally and generally.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Vock	Ido	The plans do not propose to demolish Bevis Marks. They are to build another building some distance away from the synagogue. The objections are therefore on grounds of "light" and "overwhelming" the synagogue - this in the centre of the City and just metres away from the Gherkin! Preserving our heritage is important but nebulous objections to the size of neighbouring buildings in the very heart of our capital city cannot be used to hold back economic development. I support this application and hope it will be approved.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Flaxington	Frances & Lee		N/A	Email (attached in DC- received by email file)	29-Apr-24
24/00021/FULEIA	Lawrence	Beverley		N/A	Email (attached in DC- received by email file)	29-Apr-24
24/00021/FULEIA	Gayer	Stephen		N/A	Email (attached in DC- received by email file)	29-Apr-24
24/00021/FULEIA	Hart	Ruth		N/A	Email (attached in DC- received by email file)	29-Apr-24
24/00021/FULEIA	Owen	Denise		N/A	Email (attached in DC- received by email file)	29-Apr-24
24/00021/FULEIA	Kalinowska	Jo	This is a terrible proposal! It would completely overwhelm the neighbouring synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It would block out daylight and have an immediate effect on the usage of the surrounding area.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Nowill	Rob	The VERY last thing we need is another soulless skyscraper, there are literally dozens of unfilled ones already in the area. It will utterly spoil the surrounding area. It's also in direct contravention of the conservation area, which should not have tall buildings erected within it.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Darley	Gillian	Some years ago I visited Bevis Marks with Biba Dow, architect to the synagogue, to look at proposals to enhance this remarkable survival. I was reminded of the absolute magnificence of the building - a tribute to the Great Synagogue in Amsterdam. I was representing SPAB on that occasion and we were alerted to the (previous) development proposals while looking at Dow Jones's careful work then under discussion. Then comes this monstrous new tower. I was given my OBE in 2014 marking work as an historian, author and conservation campaigner. This latest assault on one of the most evocative and atmospheric functioning buildings in the City is, not to mince words, barbaric. The City Corporation is prepared to countenance application after application on the site. This time it must forego the inducements of specious 'planning gain' to stand its ground. This is a no, no, and no.	NO	Public Access website	29-Apr-24

24/00021/FULEIA	Symonds	V	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I am a visitor to Bevis Marks Synagogue and am dismayed to see this new proposal, particularly after a similar application was refused two years ago, and also in the light of the recent adoption of the Creechurch Conservation Area. This new application is only very slightly changed from the last submission and therefore should also be refused. It is not in keeping with the conservation of a Grade-1 listed building, now also part of a conservation area. It is the most important Jewish site in the UK and the Heritage and Education Visitor Centre is due to open later this year. Its special history, reminding us of the readmission of the Jewish people to England, must be carefully preserved and not compromised by new developments. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this overwhelmingly inappropriate development send about the City of London and its values and attitude towards the Jewish community's unique heritage to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's flagship synagogue, particularly along its sensitive southern exposure. I strongly urge you to refuse this application.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Verbick	Jade	Bevis Marks is a landmark that shouldn't be overshadowed	NO	Public Access	29-Apr-24
24/00021/FULEIA	Craig Cohen	Leonora	Please do not permit the building of an enormous tower block near to London's oldest standing synagogue. This is supposed to be a protected area and there are other places to build. The construction will overshadow the synagogue and prevent full religious use of the space.	NO	Public Access website	29-Apr-24
24/00021/FULEIA	Roumani	Judith	Constructing a building of this height right next to the most historic synagogue in Britain would jeopardize many of its features. It would block the light and view of the sky and render religious services difficult. Such a building would never be contructed next to St. Paul's Cathedral, so how could it be contructed next to the 'cathedral' of synagogues? I consider this project misguided and a caving in to financial considerations over cultural, historical and spiritual ones. Thank you.	NO	Public Access website	30-Apr-24
24/00021/FULEIA	Lampert	Dorothy		N/A	Email (attached in DC- received by email file)	30-Apr-24
24/00021/FULEIA	Kateb	Fuad		N/A	Email (attached in DC- received by email file)	30-Apr-24
24/00021/FULEIA	Bloom	Alastair		N/A	Email (attached in DC- received by email file)	30-Apr-24
24/00021/FULEIA	sitch	peter	I've lived and worked in London since 1968. During that time I've seen London grow change and evolve. Much of this is good but every now and then a development is a step too far. This is one such please continue to oppose the scheme	NO	Public Access website	30-Apr-24
24/00021/FULEIA	Tamman	Jessica	Bevis Marks synagogue is an absolute pillar of the Jewish community and a historical site. It is a abhorrent that this planning permission is even being considered to be going ahead and as a member of the Jewish Community and member of the city of London working community absolutely object to the building of a sky rise that will dwarf, block the only natural light the synagogue has and further plunge this beautiful and important place into darkness	NO	Public Access website	30-Apr-24
24/00021/FULEIA	Shaw	David	This building would herald untold permanent damage to the conservation area, casting shadows across the district and blocking the key and already limited view from Bevis Marks Synagogue. The access to light and ability to see the stars are important parts to Jewish ritual that have been practiced on this site continuously for over 300 years. Such an impingement would never happen down the road in St. Paul's - why is this being contemplated here? What's the point of a conservation area if you don't preserve the totality of precious gems we have left? The City has many unused office spaces since the pandemic and I can't see how it is in anyone's interest to knock down a building that is only 40 years old and replace it with this monstrosity. Please do the right thing and reject this erroneous planning application.	NO	Public Access website	30-Apr-24
24/00021/FULEIA	Fyne BA FRSA Solicitor (Non Practising)	Daniel	I object to this application. A 42 storey tower would overwhelm the synagogue which has Grade 1 status. The synagogue has enormous religious, cultural, heritage, historic significance and importance which would be extremely harmed by the proposal. The proposal would overshadow, and harm the synagogue and courtyard. In terms of its physical and amenity aspects the proposal would be wholly inappropriate to the wider setting, The alleged benefits are not justified in the context of the harm caused and do not stand up to scrutiny. The importance of the heritage aspect of the building for the Jewish Community nationally and international must be taken into account so as to protect this valuable religious and heritage asset from the harm caused by the proposal.	NO	Public Access website	30-Apr-24
24/00021/FULEIA	Brett	Edward	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship - installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings and has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue but do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community. laims about the community value of the uses must be viewed with great scepticism. The existing building at 31 Bury Street is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply bad for environment. The proposed building would also damage the setting of other heritage assets.	NO	Public Access website	01-May-24
24/00021/FULEIA	Mainz	Andrew	The proposed new building will intrude on the Bevis Marks synagogue and its small outside space. This should not be permitted, to preserve the historic nature of these premises.	NO	Public Access website	01-May-24
24/00021/FULEIA	Tarlton	Calvin		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Farrell	Tommy		N/A	Email (attached in DC- received by email file)	01-May-24

24/00021/FULEIA	Dean	Gemma		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Feldman	Alex		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Cory	Graham		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Gorman	Suzanne		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Baccus	Aslam		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Hillman	Michael		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Sames	Dan		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Sapphire Employability			N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Castle	Lauren		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Webster	Oliver		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Webster	Oliver		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Chadwick	Nicola		N/A	Email (attached in DC- received by email file)	01-May-24
24/00021/FULEIA	Parsons	Kathleen	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a Sephardic descendant and a friend of Bevis Marks' Spanish & Portuguese Jewish community. I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the incorrectly titled Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade I listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. Also, I genuinely believe in the importance of London's current and historical survival to the existence of European Jewry, and Bevis Marks is the most crucial example of this continuing struggle The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern skyview, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of Saint Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	01-May-24
24/00021/FULEIA	Scott	Adam	Great design. Respectful of its neighbours in a consented tall buildings area. I am in favour of the massing and the height - in fact I think it could probably be taller. I full support this proposal.	NO	Public Access website	01-May-24
24/00021/FULEIA	Morley	Phillip	This is question comes up time and time again, which is completely valid, but is never really answered by planners. Why do we need another high skyscraper building? Less people are going to the office and remains empty at weekends, just doesn't make economic sense. We have a lack housing stock, surely the money is better spent focusing on that or improving the current building or brownfield sites. I have no objection to change, but when the designs are not authentic or respects it's surroundings, then it is a different matter. We are loosing or have indeed lost allot of our London skyline and this just adds to the problem.	NO	Public Access website	01-May-24
24/00021/FULEIA	Franco	Mario	Respect history, respect the Jews, respect the synagogue.	NO	Public Access	01-May-24
24/00021/FULEIA	Jackson	Alexandra	I'm horrified that there is again a threat to Bevis Marks Synagogue- an historic building which is still in use. It pre dates St Paul's Cathedral which would never be faced with a development of this type. This synagogue is important on number of levels in this country's history and was where my family worshipped for many years (Saqui). The plans represent inappropriate overdevelopment of this site and would dwarf and disrespect this historic Synagogue. A 43 story building with a 4 storey basement could easily be located in Dockabds where there is plenty of space. Once this is allowed there will be no going back so the planning committee should stand up for what is right and not be pressured by commercial concerns. Don't grant this permission.	NO	Public Access website	01-May-24
24/00021/FULEIA	Jackson	Paul	I object to the development. It will overshadow a landmark listed building that is used daily for religious services, and which itself is a tourist landmark. The interior will be darkened by the proposed overbearing development, which is barely meters away from the synagogue. I am a member of the synagogue.	NO	Public Access website	01-May-24
24/00021/FULEIA	Shaw	David	This proposal is incredibly insensitive to the Jewish community in London. To build a tower so close as to obscure the oldest synagogue in the UK is cultural vandalism of the highest order. Furthermore as the main site of the Spanish Portuguese Jewish community, it hurts an even smaller community. Please consider this and reject this proposal in its entirety. Thank you	NO	Public Access website	01-May-24
24/00021/FULEIA	Rabinowitz	Monica	I object to the construction of a 43-storey tower next to Bevis Marks Synagogue, a Grade I-listed building. As the oldest continuously used synagogue in Britain and one of cultural and historical significance, this would create an unacceptable impact on the continuing Jewish community who still use the premises today. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, overwhelming and overshadowing the synagogue building and courtyard. There is not good enough reason to build such a tall building on these premises, when there are other sites that would suit it, instead, and have less of a damaging impact on its sensitive surroundings.	NO	Public Access website	01-May-24
24/00021/FULEIA	Denham	Alison	It will tower over a beautiful historic site.	NO	Public Access	01-May-24
24/00021/FULEIA	oleary	Lorraine	The Synagogue at Bevis Marks serves as an important cultural and historical landmark for jews throughout the world and should've saved at all costs	NO	Public Access website	02-May-24
24/00021/FULEIA	Chissick	Michael	The Bevis Marks synagogue is of historical importance and the building would reduce its light. I thought this had already been sorted but it looks like the developer is back. Please stop it	NO	Public Access website	02-May-24
24/00021/FULEIA	Midda MBE	Loraine	This development will disrupt the calm and peace of the beautiful Bevis Marks synagogue. The synagogue will be shadowed and the light will be blocked. This is the third time development has been requested even though plans had been rejected previously. And for the reasons previous plans were rejected these should be as well. The synagogue is an important historical living building for the Jewish community and should be treated with the respect it deserves.	NO	Public Access website	02-May-24
24/00021/FULEIA	Hollick	Jeanette	This is disgraceful and should be stopped. Already too many high rises in the area spoiling its special character.	NO	Public Access website	02-May-24

24/00021/FULEIA	Goldstein	Andrew	As an occasional worshipper at Bevis Marks Synagogue I am inspired by the tranquility and spirituality of the place. It really is a unique experience in Britain. Yes, it is hemmed in by other buildings, but just about retains its unique atmosphere. The proposed development would undoubtedly overshadow the building and overtake and dominate this atmosphere. Such a massive development is totally out of place and must be opposed. Even the proposed 4 stories of basement present a danger to the structure of the historic synagogue.	NO	Public Access website	02-May-24
24/00021/FULEIA	Samsworth	Jane	I object to the diminution of real history, Bevis Marks This development would be ruinous.	NO	Public Access website	02-May-24
24/00021/FULEIA	Stock	Caroline	I have written in before for a previous application and this is only a modification of that application. This building is inappropriate in this position particularly as it's a Conservation area. The building would totally dwarf the historic synagogue that would be below it. There are plenty of tall buildings in the square mile, but to build this size of structure in this position which will have a dramatic visual impact is inappropriate. Please listen to the objections.	NO	Public Access website	02-May-24
24/00021/FULEIA	Heitlinger	Philip	The development would block out light complwtely fr this 340 year old synagogue which is on active use today	NO	Public Access website	02-May-24
24/00021/FULEIA	Hammond	Joan	Developers have erased too much of London's beautiful and colourful history in the name of making money! There has to be a halt to this before all of London's history - in particular, the original City of London - is erased and forgotten. We cannot allow that to happen. It's too important to London, Great Britain and the civilised world. If evil hasn't been able to achieve the ruination of London's rich history, then corporate planning has to be stopped from achieving such evil. Stand with Bevis Marks and stand with great history.	NO	Public Access website	02-May-24
24/00021/FULEIA	Crowne	Tilla	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a trustee of Bevis Marks' Spanish & Portuguese Jewish community closely involved with the back and forth regarding the proposed development at 31 Bury St I am dismayed to once again be having to write in to object. Having fought hard to have the new Creechurch Conservation area approved, the proposed development at 31 Bury St is virtually unchanged after its initial refusal two years ago. Despite having knocked off two upper floors, it in fact now has a larger footprint and so is an even larger development than the previous one! Despite a slight reduction in height and re-angling of the building, it still lies right in the path of both the sun and the moon in the little remaining skyscape the synagogue has left. The result is that, by day, a significant amount of sunlight is blocked to both the synagogue building proper, and to the courtyard which is crucial for reflected light entering the windows. As a Grade 1 listed building, not an office block, we cannot simply install bright overhead LED tubes, nor should we have to. Holy texts are read from parchment and congregants follow in books, as no electronic displays are permitted on sabbath and festivals. By night, the transit of the moon after dark, a crucial component of Jewish worship is actively blocked. Both of these are important not simply because of the character of the building, but because this is the home of a living congregation, the longest-standing in the UK, for whom worship is being made increasingly difficult. The proposed tower would dominate the setting of the synagogue, and makes a mockery of the conservation area. From ground level, the tower would dominate and block views not just from the courtyard but also from Heneage Lane and create a virtual cliff-face, entirely changing the scale of the entire block. Proposed benefits are negligible and the harms are real. I urge you to refuse this application.	NO	Public Access website	02-May-24
24/00021/FULEIA	Krol	Alan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of British Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	02-May-24
24/00021/FULEIA	Grossman	Deena	Having reviewed the over development of this site I am horrified to even see the initial plans which will again blight the landscape of the City of London. London has enough skyscrapers we do not need another one and certainly not one in the shadow of a historical building like Bevis Marks Synagogue. This is pure greed on the part of the owners and developers. No thought has been given to the history of the area. I strongly oppose the planning application	NO	Public Access website	02-May-24
24/00021/FULEIA	Graham	David	This building is a poor quality ugly design, of undue scale and massing which detracts from the character of the conservation area. It will cause substantial harm to the significance and ongoing optimal use (for religious worship and study) of Bevis Marks Synagogue, a Grade I Listed building, by overshadowing, loss of daylight to its interior which was designed to mainly be naturally lit, and marring the setting/ views around the building. The site would also be better used for housing above mixed-use development at street level, rather than unsustainable office space in a new building with a short design life. Houses are unaffordable in London whilst there is a massive surplus of office space owing to remote and flexible working.	NO	Public Access website	02-May-24
24/00021/FULEIA	Clarkson	Paul	It is not suitable for this kind of setting. Please deny this application	NO	Public Access	02-May-24
24/00021/FULEIA	Firth	Tanya	This application is unacceptable as it will change the character of the neighbourhood and affect local low rise buildings like the synagogue. Our heritage is more important than profit and insensitive building projects. Tanya	NO	Public Access website	02-May-24
24/00021/FULEIA	Braithwaite	Nick	This would seriously affect the light coming into the very important adding Bevis Marks synagogue	NO	Public Access	02-May-24
24/00021/FULEIA	Wertheim	David	I wish to object on the grounds that the proposed development contravenes the NPP Guidelines relating to Conservation Areas and Listed buildings as it will detract rather than enhance the area and will visually detract from the neighbouring Grade 1 listed Bevis Marks Synagogue. I am personally familiar with the Synagogue and attended the wedding service there of the child of one of my oldest friends. The building has survived miraculously for over three centuries including the bombing of London during WWII. To allow this development to go ahead would be an act of wanton architectural and heritage destruction.	NO	Public Access website	02-May-24
24/00021/FULEIA	Dorey	Helen	These plans for a 43-storey tower would seriously harm the significance of one of Europe, not just the UK's - most important religious buildings, Grade I-listed Bevis Marks Synagogue (1701). This extraordinary building commemorates tolerance in the UK and has survived wars and waves of City development as a centre of worship and Jewish life since 1701. This is extraordinary, remarkable building is the jewish counterpart to a Wren City Church and of equal importance. The synagogue now has official protection with the designation of the new conservation area in Creechurch - so how is it possible that fresh plans for a 178m tall tower right next to it can even be put forward, let alone seriously considered. The City must act to protect this internationally important building - both architecturally and symbolically immensely significant. This development is simply totally unacceptable and it would be the most appalling dereliction of duty were it to be approved.	NO	Public Access website	02-May-24
24/00021/FULEIA	homewood	alison	Why on earth do you want to make London like Hong Kong? This is a disastrous proposal - 43 storeys, ever higher, right next to one of the most historic and beautiful and reasonably-sized buildings in a heritage area. Do you want a target for planes? For bombs? For fires? And even if none of those ever happen this building is entirely disproportionate to its proposed site. It is ugly, banal, of no architectural merit whatsoever, and post-COVID, totally unnecessary as there is so much vacant office space already. It will cast an ever-present shadow, set a precedent for other 40+ storey buildings and before you know it there will be a total wind-tunnel. Please please kill this proposal in its tracks.	NO	Public Access website	02-May-24

24/00021/FULEIA	Webb	Julia	I object to this application on heritage grounds. The incalculable importance of Bevis Marks synagogue in historical, heritage and cultural terms, in addition to its religious importance , will be irretrievably damaged by such an overbearing massive development right next door. The City of London has declared this a conservation area, so permitting this development would breach the City's own policies. The rampant overdevelopment of the City of London means that it is losing its spirit and charm, along with its heritage assets. To inflict this development on Bevis Marks would be an absolute disgrace. I hope that the City will reject it out of hand.	NO	Public Access website	02-May-24
24/00021/FULEIA	Banatvala	Fiona	This proposal is for a 45 storey tower would completely dominate the Grade 1 Listed synagogue skyline. It would also reduce daylight into the synagogue dramatically and because of the historic nature of the building, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is to not allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. It is so important to protect our grade 1 listed buildings from harm and this, undoubtably will harm a grade 1 listed building, which is an important part of the local heritage within this protected Conservation Area. The plans have been previously turned down and have only been amended with superficial changes. This proposal is not supported by the local community.	NO	Public Access website	02-May-24
24/00021/FULEIA	Hepher	Roger	The proposed tall building would be highly damaging to Bevis Marks Synagogue, the Creechurch Conservation Area and the setting of the Tower of London (World Heritage Site). It runs completely counter to national and local heritage policy, and the claimed "public benefits" do not begin to outweigh the heritage harm (some of which would be "substantial").	NO	Public Access website	02-May-24
24/00021/FULEIA	Horowitz	Michael	Please do not overwhelm a precious island of history. This is a symbol of a history of tolerance in London's story.	NO	Public Access website	02-May-24
24/00021/FULEIA	Wakeman	Lindsay	I wish to register my objection to the planning applications. My reasons are as follows: 1. The planned developments will seriously adversely affect the Bevis Marks Synagogue in terms of both its existing setting, and its supply of natural daylight. 2. Possible further adverse effects and damage to the foundations of the Synagogue and the fabric of its structure. 3. The Synagogue is a Grade I listed building of national significance, the oldest in the UK, and has been for over 300 years continuously a working building and centre of Jewish faith and for these reasons should not be subjected to any potential damage or detrimental changes to its surrounding, daylight supply, and outlook. 4. The proposed developments are of an entirely different scale and design, will not be in any way in sympathy with the ancient Synagogue, and will dwarf and forever change its setting. 5. The London Plan contains policies that state that tall and very large buildings must not adversely affect the surroundings of, or overshadow, existing buildings.	NO	Public Access website	02-May-24
24/00021/FULEIA	Dunkley	Sam	This is an outrageous breach of the protection of a grade 1 listied building /conservation area, with enormous historical resonance. thanks to the Nazis there are few such historic synagogues left. This , proposal show complete disrespect for that, as well as the conservation protection..	NO	Public Access website	02-May-24
24/00021/FULEIA	Montlake	Martha-Anne	This historic building needs to be protected and be available to future generations without anything impeding its future character and function.	NO	Public Access website	02-May-24
24/00021/FULEIA	Glaessner	Verina	We object most strongly to this application which will by virtue of its scale and mass at a stroke and quite without any necessity at all, reduce this finely concieved physical testimony to the texture and social lives of those who walked these streets before us. This precious sense of place and time, which such evidence of the depth and importance of lives that gives cities their character, to be overxhelmed by buildings of	NO	Public Access website	02-May-24
24/00021/FULEIA	Julius	Corinne	The proposed development will overshadow the synagogue, changing the light in the interior and the view from the courtyard. This is an important religious building with symbolic significance, not only to Jews but to the wider community. It is a tranquil space that can be used by all. The new building would destroy the calm and peace, so relaxing in such a busy area.	NO	Public Access website	02-May-24
24/00021/FULEIA	Glaessner	Verina	We object most strongly to this application which will by virtue of its scale and mass at a stroke and quite without any necessity at all, reduce this finely concieved physical testimony to the texture and social lives of those who walked these streets before us to the merely vestigial and cute. It is this precious sense of place and time, which such evidence of the depth and importance of former lives lived, that gives cities their character. And that to be overwhelmed by buildings already way out of date, dependent on dwindling resources, water and energy ! Unacceptable.	NO	Public Access website	02-May-24
24/00021/FULEIA	Hunt	R. G.	This is a 43 storey tower next to a Grade 1 listed building in a conservation area. Does the developer think the councillors are fools?	NO	Public Access website	02-May-24
24/00021/FULEIA	Scott	Paul	I object to having a 43 storey building on this location for numerous social, environmental, public health, fire safety and heritage reasons. It will greatly change the character of Bury Street if this structure is built so close to a well established historic synagogue which has a lot of architectural value. There would also be an increased amount of noise pollution during construction which means that many other nearby people are going to be suffering the adverse effects of this proposed scheme too.	NO	Public Access website	02-May-24
24/00021/FULEIA	Penny	Susan	I object to the proposed new building because of the serious negative impact it would have on the historic nearby synagogue.	NO	Public Access website	02-May-24
24/00021/FULEIA	Cannell	Dave	This is eroding a very historic part of the City. Do we really need another skyscraper?	NO	Public Access	02-May-24
24/00021/FULEIA	Morris	Shelagh	We have no need for further office space now so many people work from home. We cannot allow unnecessary structures to bully and dominate such a precious piece of our joint heritage. Do not be deceived into thinking that this is only Jewish heritage, because beauty that has been loved and preserved belongs to all of us and we are responsible for it.	NO	Public Access website	02-May-24
24/00021/FULEIA	Venner	Peter	At a time when our very civilization seems to be tottering into chaos, the wanton destruction of yet another building of architectural, historical, cultural and spititual distinction merely to further greed of monetary gain can only fill us with despair.	NO	Public Access website	02-May-24
24/00021/FULEIA	Ramsay	Steve	This magnificent building needs to be protected from close development.	NO	Public Access	02-May-24
24/00021/FULEIA	Kustow	R Alexandra	I'm a Londoner, born and bred, although temporarily in the US. I object to the demolition of the Bevis Marks synagogue and Bury House. This is part of our London cultural, historical and physical heritage which many of us are proud of. To destroy this in order to erect yet another - from the exterior likely faceless, or worse, unappealing in every way stated - excessively tall building is to trash our heritage. And for what reason? To make the rich even richer. The quality of our streets and our lives are far more uniquely valuable than this. I STRONGLY OBJECT!	NO	Public Access website	02-May-24
24/00021/FULEIA	Lilley	Rebecca	I object to application 24/00021/FULEIA on the basis of its negative impact on the setting of Grade I-listed Bevis Marks Synagogue, and the conservation area in which it is. The application is at a scale which does not respect the heritage building line of the area, nor the character.	NO	Public Access website	02-May-24
24/00021/FULEIA	Plummeridge	Joy	Apart from the significant impact this would have on the environment, the traffic congestion the demolition and construction would cause, there is the matter of the amount of Co2 which will be released not only by the demolition but also by construction of a new building. There is the fact of the historical context of this building, and what it means to the people who use it, its links to their fore fathers.	NO	Public Access website	02-May-24
24/00021/FULEIA	Hibbert	Neil	This is an outstanding historic building.If this is in a conservation area then a high rise block affecting light and dominating the area is totally inappropriate.	NO	Public Access website	02-May-24

24/00021/FULEIA	Miller	Jonathon	As a member of London's Jewish community I object in the strongest terms to plans for a tall building next to Bevis Marks Synagogue. Such a building would have a detrimental impact upon the synagogue's light which would negatively impact upon its use and enjoyment by the community. This is a grade 1 listed building and one of the most important and historically significant Synagogue's in the UK. As with any building of such unique and irreplaceable historic and cultural significance, it must be protected and I urge you to deny the planning application. In this matter you act as protectors and conservators of London's history and heritage have an obligation on whose behalf you hold office to make the right decision when it is in your power to do so. London needs to progress as any city does, but it must not be at the expense of its heritage nor of the rights of its ethnic minorities to continue to use and enjoy their historic places of worship and irreplaceable centres of culture. There will be many new buildings constructed in London in time to come, yet there can never be another Bevis Marks Synagogue and it is your responsibility to ensure it not only survives but does remains in the same condition and with the same quality of context as befits a building that represents so much. Please do the right thing, reject the planning application, protect this important building and in doing so send a message that the interests of all minorities in London will be respected and protected for the generations who have been and the generations to come, for who Bevis Marks is their legacy and inheritance. Thank you	NO	Public Access website	02-May-24
24/00021/FULEIA	Howe	Andrew	Totally out of keeping for this area. This monstrosity will dwarf the synagogue and should not even be considered. Throw the application out please.	NO	Public Access website	02-May-24
24/00021/FULEIA	Ellis	Peter	Bevis Marks Synagogue is a little haven of tranquillity off a busy thoroughfare. The proposed development would destroy the setting of this iconic building and compromise its unique atmosphere.	NO	Public Access website	02-May-24
24/00021/FULEIA	Salter	Amy	This should be a protected view from the synagogue Many years of history at Bevis Marks	NO	Public Access website	03-May-24
24/00021/FULEIA	Beard	David	To place a 43 story skyscraper next to a unique Grade 1 listed building that relys upon light streaming through its windows is sheer folly and insults the synagogues unique status. In the right place the skyscraper is a welcome addition to the City, but this is not the right place. If Aldgate and Creechurch are to keep their heritage, equally so should Bevis Marks. This is the wrong building for tghis site. (FYG I am a businessman who has spent 45 years working in the City)	NO	Public Access website	03-May-24
24/00021/FULEIA	Corrin	Christopher	I am very surprised and shocked to see that yet another attempt is being made to erect an entirely inappropriate tall tower block in the Creechurch Conservation area. The proposed building would completely alter the aesthetic character of this area and its special buildings, especially the Bevis Marks synangogue but also Holland House, Renown House, St Catherine Cree Church and St Botolphs. There are so few areas of the historic City that have been left relatively unspoiled and this proposal would utterly spoil the character of this particular conservation area with a scale and design that is completely overwhelming. I urge you please to reject it.	NO	Public Access website	03-May-24
24/00021/FULEIA	Hardisty	Michael	This development, and others like it, goes completely against London's and the UK's ambition of achieving Net Zero carbon emissions. The emissions associated with demolition and construction will be massive and contradicts the first step of carbon management in infrastructure (PAS 2080): build nothing. It will also take natural light from surrounding buildings and streets, as well as trampling on local heritage. No.	NO	Public Access website	03-May-24
24/00021/FULEIA	Pike	Graham	I would like to object to this application for the following reasons: 1. The application is in the Creechurch Conservation area and tall building are in appropriate in that area.. 2. The application would be for a building that is overbearing in height for that location to the detriment of the other local properties. 3. The application would be for a building that would, for large parts of the day, create shadows on adjoining buildings to their detriment. 4. The streetscape would be altered dramatically to the detriment of the Conservation Area. Thank you. Graham Pike.	NO	Public Access website	03-May-24
24/00021/FULEIA	Bilbul	Jonathan	Would cause great harm to the Bevis Marks Synagogue of which I am am member. It is a site of great historical significance. A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.	NO	Public Access website	03-May-24
24/00021/FULEIA	Shintag	Rachelle	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). Having already objected to the previous (refused) proposal two years ago, I'm appalled to see this new proposal, particularly after the recent adoption of the Creechurch Conservation Area which was supposed to protect Bevis Marks synagogue and other heritage buildings in the area. This new application, barely changed since the previous (rejected) submission, is simply not in keeping with the conservation of a Grade-1 listed building (now also in a conservation area) which is the most important Jewish heritage site in the UK. The new tower to the synagogue's immediate south would dominate the synagogue's setting, block out the religiously important southern sky-view, and overshadow the synagogue premises, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral and should certainly not be permitted just metres from British Jewry's oldest active synagogue, particularly along its sensitive southern exposure. Heritage sites such as Bevis Marks Synagogue, by their very nature, cannot be moved and deserve protection as an integral part of their surrounding built environment. By contrast, the proposed new tower is utterly generic in design and use, and there is no compelling reason why this cannot be developed in another location which does not impinge on a listed building and agreed conservation area. I urge you to refuse this application.	NO	Public Access website	03-May-24
24/00021/FULEIA	Gubbay	Judith	Bevis Marks has been a haven and a sanctuary for Jewish people whose forebears (including my own) had borne the brunt of religious persecution and exile during and after the Spanish Inquisition. We are grateful to the city fathers who have supported us in remaining a vital part of the community and allowing us to pray in peace, under a sky unimpeded by valueless buildings that are out of proportion with the human-scale historic city. Please turn down this latest attempt to spoil all this.	NO	Public Access website	03-May-24
24/00021/FULEIA	Schluter	Angela	I object to a high rise block so close to this ancient place of work.	NO	Public Access	03-May-24
24/00021/FULEIA	Owens	M	The new build could affect the structural integrity of the historic building and any potential damage may have irreparable and catastrophic consequences. Such a proposal should not be considered in a Conservation Area.	NO	Public Access website	03-May-24
24/00021/FULEIA	Thompson	Alan	Totally unnecessary to build this.	NO	Public Access	03-May-24
24/00021/FULEIA	Baskerville	Patricia	Our once beautiful City of London has already been desecrated enough, it's doesn't need another short that will stay empty.	NO	Public Access website	03-May-24
24/00021/FULEIA	ISRAEL	ANTHONY	BEVIS MARKS IS A HISTORIC LISTED BUILDING IN THE CITY OF LONDON AND HAS ALREADY CELEBRATED OVER 300 YEARS IN THE CITY OF LONDON. YOUR NEW DEVELOPMENT WILL DESTROY THIS HISTORIC PLACE OF WORSHIP, TO WHICH MANY FAMOUS PEOPLE HAVE VISITED FOR CELEBRATIONS AND MEANINGFULL WORSHIP. THIS INCLUDES KING CHARLES, A SUPPORTER OF " FAITHS " WITHIN THE UNITED KINGDOM. A DEVELOPMENT OF THIS SCALE WILL OVERWELM BEVIS MARKS AND CAUSE A NUISANCE OF TRAFFIC AND OF PARKING. ADDITIONALLY THE BUILDING OF THE NEW DEVELOPMENT WOULD CREATE IN ITSELF MUCH DIRT, DUST AND DISTURBANCE TO THE CITY OF LONDON.	NO	Public Access website	03-May-24

24/00021/FULEIA	Tyson	Diana	I object to the plan to build a 43 story building overshadowing Bevis Marks synagogue, which is in the Creecurch Conservations area and listed Grade 1. The synagogue dates from 1701 and is one of the most ancient heritage monuments in London. It depends for its light provision to there being space around it to let in natural light. The planned tall building would severely impact on this need and on the proper functioning of the synagogue. This is the third time that planning permission is sought to erect a very tall building next to it; the fact that the previous two attempts failed surely should show that such a procedure is unacceptable. Respect for our cultural heritage is an urgent need. Too much of it has vanished, through the ravages of time or weather, through war, through natural disasters. What is left should be cherished, not vandalised through totally avoidable adverse planning decisions.	NO	Public Access website	03-May-24
24/00021/FULEIA	Garnham	Lucy	I believe to take away this historic place of worship from the local jewish community would be incredibly disrespectful and racist. I also believe it would be a tragic loss of a beautiful example of historic architecture. After noisy and invasive construction of the unattractive and cheap looking block which has been proposed, there would have been nothing gained only lost by the local community. I would dub the proposition a nonsensical waste of funds and I consider myself strictly against this proposition, and wholly in favour of preserving this historic place of worship.	NO	Public Access website	03-May-24
24/00021/FULEIA	Stallwood	W	This is a historical place of interest and a place of beauty I think that dwarfing it with a glass monolith will seriously detract from it's beauty We need to keep more places like this	NO	Public Access website	03-May-24
24/00021/FULEIA	Saunders	Joanne	The synagogue is of significant cultural importance and has a protected status. This application will encroach on the purpose and culture of this historical site. I strongly object.	NO	Public Access website	03-May-24
24/00021/FULEIA	Mocatta	Michael	I am writing to condemn the plans for the new skyscraper next to Bevis Marks. Why is it necessary for me to write to you again? I have written several times before to explain my objection. It is thoroughly disingenuous, immoral and underhand of you to have allowed a new skyscraper to be submitted so recently after approving a conservation area around the Bevis Marks synagogue. You and the developers should be deeply ashamed of yourselves. As mentioned before, my family have been members and regular attendees at Bevis Marks since before its foundation (we arrived in London in 1680, and helped pay for the construction of Bevis Marks). My family name is literally written on the walls there. The building is holy - and the lighting within it is part of its holiness. You should know by now that blocking access to natural light through building a skyscraper nearby will change the character of Bevis Marks synagogue deeply, for the negative. Please log my objection - and please desist in this silly game you're playing with the developer.	NO	Public Access website	03-May-24
24/00021/FULEIA	Balkin	Brian	The building (s) would be entirely out of keeping with the surroundings, especially given the historic building right next door. It would diminish the area to have such a building in such a position. There are plenty of other locations for a build if this type. A 43 story building, quite rightly, would not be allowed next to St Paul's.	NO	Public Access website	03-May-24
24/00021/FULEIA	Amar	Janine	This should be a heritage site. It's the oldest synagogue in England and it is still in use. Would you do this the to St. Paul's Cathedral?	NO	Public Access website	04-May-24
24/00021/FULEIA	Liverseidge	Janice	Application to knock down buildings and erect this too large, totally inappropriate building is so wrong. It will have a huge negative impact on Bevis Marks Synagogue which is an important and vital part of London's heritage and contemporary life. The proposal should be rejected outright	NO	Public Access website	04-May-24
24/00021/FULEIA	Lawrence	P	Dear Persons , I am not sure this would fall under your planning legislation , however aside from maybe taking over any sunlight which persons in the U.K. often have an issues its most likely a blight on the sky line , will create over crowding , congestion , ruin heritage ,	NO	Public Access website	04-May-24
24/00021/FULEIA	Childerstone	Meredith	I object to this proposal for two key reasons. Firstly, it heavily affects listed buildings that are an important part of the Heritage both to the City of London and the UK. The overwhelming size and proximity of the development will seriously impact on existing Listed Buildings and in particular an ancient and important place of worship. Secondly the plan does not appear to meet the UK's legal carbon commitment or the rapidly changing pressures from climate change. Climate change requires much greater use of structure and material together with repurposing and retrofit. Infrastructure needs such as water and renewable electricity are also critical. The current proposals do not appear to meet either of these.	NO	Public Access website	04-May-24
24/00021/FULEIA	Moses	Selina	Will you stop trying to take natural light and space from a historical building that is still used today. What disrespect. BM synagogue is irreplaceable	NO	Public Access website	04-May-24
24/00021/FULEIA	Rothschild	Louise	I work in EC3 and it is becoming an increasingly more unpleasant space. Huge monolithic structures gobble daylight and create wind at ground level. The City used to pride itself on architecture however it is now allowing glass boxes. This building is inappropriate for the area - too large, and inflicting irreparable damage on areas of English heritage such as the Bevis Marks synagogue. Those of us using the area have no desire for yet more tower blocks, we want buildings that are human in scale, architecturally congruent with what is already there, and considered with regard to maintaining street scenes and heritage. This is none of the above.	NO	Public Access website	04-May-24
24/00021/FULEIA	Kal-Weiss	Holly	Despite being in a conservation area, there are plans to build a 178m tall tower right next to Bevis Marks. This will seriously harm the significance of this internationally important building. We all benefit from such an historically significant and iconic building. Please protect Bevis Marks for future generations of worshipers, residents and tourists alike.	NO	Public Access website	04-May-24
24/00021/FULEIA	Carp	Debbie	This synagogue is of vital historical interest to the whole Jewish community in the UK if not in the world. It has historic significance and has stood in this location for centuries. A high rise block of offices situated immediately next door to it will block light, encourage crowds and heavy footfall, noise, disturbances, litter and take away the quiet peaceful surround necessary for a place of worship. Please don't go ahead with plans for this high rise office block.	NO	Public Access website	04-May-24
24/00021/FULEIA	Walker	Caroline	Totally unacceptable to develop multiple storey, excessive height buildings which dominate and destroy the character of listed and cherished adjacent buildings.	NO	Public Access website	04-May-24
24/00021/FULEIA	Goldman	Jeffrey	This development will overshadow and overpower one of the most important buildings in the City - Bevis Marks Synagogue, the oldest place of Jewish worship in the country that is still operating. The proposed development would be an act of cultural and religious vandalism showing that the City authorities no longer have any appreciation or respect for its historical buildings that are of importance, not just to Londoners, but to people around the a world. This should not be the type of message or impression that the City should be giving.	NO	Public Access website	04-May-24
24/00021/FULEIA	Beenstock	Sian	Protect Bevis Marks Synagogue it is in a Conservation Area and soon opening a Tourist Attraction in the grounds.	NO	Public Access website	04-May-24
24/00021/FULEIA	Whaley	karen	This new building is a monstrosity that will overshadow a beautiful grade one listed synagogue. It will cut out the light, seriously impacting the appearance of the glorious interior and will have a negative effect on the worship experience of the congregation. Please do not allow profit to come before beauty and history.	NO	Public Access website	05-May-24
24/00021/FULEIA	Caller	Niki	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.	NO	Public Access website	05-May-24

24/00021/FULEIA	Tolley	Tamara	It is vital that Jewish heritage sites as important as this are fully protected. The protections in place do not stand up to scrutiny. The light the synagogue needs will be overshadowed and its very character destroyed. This would never happen to St Paul's Cathedral. This Bevis Marks Synagogue is as important to London's diverse history as the Cathedral and as such should be protected.	NO	Public Access website	05-May-24
24/00021/FULEIA	Silverstone	Fay	My husband and I were married in this beautiful synagogue in 1994. I have worked in this area for many years. It is a beautiful, historic building that needs to be protected from any unnecessary detrimental works that could in any way infringe its historic importance.	NO	Public Access website	05-May-24
24/00021/FULEIA	Gilbert	Dina	* The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. * The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. * It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is this heritage site not afforded the same protection? * It would further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. * The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. * It is disingenuous to claim to recognise the importance of the synagogue, yet simultaneously facilitate a development that will damage its use.	NO	Public Access website	05-May-24
24/00021/FULEIA	Kuhn	Michael	how many times do we have to object to the negative impact this will have on the treasure that is Bevis Marks synagogue?	NO	Public Access website	05-May-24
24/00021/FULEIA	Symons	Geraldine	I strongly object to this planning application for the building so near the Historically important Bevis Marks Synagogue..To block out so much more light is outrageous.. Developers are getting much to greedy. Bevis Marks is the most important and oldest Synagogue. in the country and must be looked after with great care.	NO	Public Access website	05-May-24
24/00021/FULEIA	Gafsen	Susan	This is a grade 1 listed building and a very important part of Jewish heritage in London. My great great grandparents were married there. This development would severely impact the light and the enjoyment of the synagogue and at the current time it's important that we respect the significance of this building for the diaspora and for London heritage.	NO	Public Access website	05-May-24
24/00021/FULEIA	Goodman	Judi	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.	NO	Public Access website	05-May-24
24/00021/FULEIA	Stone	Lee	The proposed building would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship.	NO	Public Access website	05-May-24
24/00021/FULEIA	Newman-Crane	Sue	I write as a member of SAVE Britain's Heritage, hoping to do just that to protect the surroundings of the Jewish synagogue nearby which is both Grade 1 listed and in a conservation area. This vast tower would adversely affect the setting of the synagogue, and in addition, add another nail in the coffin of the City of London skyline, which is increasingly ruined and is so important to the capital's unparalleled visual heritage.	NO	Public Access website	05-May-24
24/00021/FULEIA	Sinclair-Horne	Annabel	A 45 storey tower would completely overwhelm this historically significant Grade 1 listed synagogue. It would overshadow the synagogue and its courtyard for most of the day, reducing its useability of the courtyard for religious festivals and celebrations. It would also particularly affect the daylight into the synagogue, making it even more difficult to conduct religious practises. Also, due the protected significance and design of the synagogue, it is not possible to install additional electric lighting. This area is within the Creechurch Conservation Area which does not permit tall buildings, and therefore this development should not be granted. The proposed building would further undermine this historically valuable Conservation Area.	NO	Public Access website	05-May-24
24/00021/FULEIA	Rahamim	Simon	The proposal will severely and adversely affect a Grade I listed building of major historic relevance and of great importance to the Jewish community. It will completely overshadow the synagogue, block its southern sky view and affect the light. It is disappointing to see yet another proposal being put forward that will seriously diminish this important site. As a regular visitor and worshipper at Bevis Marks I believe that the proposed development will be disastrous to this historic site.	NO	Public Access website	05-May-24
24/00021/FULEIA	LEHMANN	Laura	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.	NO	Public Access website	05-May-24
24/00021/FULEIA	Bekhor	Alan	As a worshipper belong to the historic Spanish and Portuguese Jews' Congregation, which is the oldest Jewish Community in the UK, I am appalled by the proposed scheme. Not only does the scheme severely restrict light into this beautiful building, but it further eclipses a heritage site which is unique in Britain. Our planners will not be doing their job in preserving our historic landmarks, if they allow this scheme to go ahead. Alan Bekhor	NO	Public Access website	05-May-24

24/00021/FULEIA	Pick Crystal	Suzana	A 45 storey building would completely overwhelm the synagogue, which is a Grade 1 Listed building with a huge historic and cultural significance. I can't understand why such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would change the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. Although, the proposed building may be well designed and an exemplar of sustainability it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.	NO	Public Access website	05-May-24
24/00021/FULEIA	Daniel	Edward	I think this is an unnecessary and gratuitous project. A 45 storey building would involve horrendous levels of disruption during construction and become an eyesore and obstacle to the local area. The extensive damage to the nearby station would cause chaos and the endangerment to the Bevis Marks synagogue is unforgivable. This project should be cancelled.	NO	Public Access website	05-May-24
24/00021/FULEIA	Harris	Joy	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member the Jewish Community at large and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application,is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	05-May-24
24/00021/FULEIA	Rose	Helena	This Synagogue is a prominent landmark in London and a holy synagogue for Jewish people. It has been in continuous use for over 300 years and two world wars. Why should greedy developers be able to desecrate such a holy place and destroy an historical house of worship of this stature?	NO	Public Access website	05-May-24
24/00021/FULEIA	Angus	Bernard and Ruth	Why are our heritage sites always the ones councils want to pull down to build new Britain's heritage is important to us older people	NO	Public Access website	05-May-24
24/00021/FULEIA	Stagni	Silvano	I am a member of Bevis Marks synagogue. I think that a building of that caliber would not be allowed next to StPaul's cathedral. Bevis Marksnis a grade 1 listed building, the first synagogue established in the U.K. after the readmission. It is a symbol for Anglo-Jewry at the same level as StPaul's for every Londoner. A building of over 40 stories next door would completely obliterate it and reduce the already low level of natural daylight. It would not be allowed near StOaul's cathedral, why is it allowed near Bevis Marks?	NO	Public Access website	05-May-24
24/00021/FULEIA	Brice	Katherine	I object to the creation of a 43 storey tower so close to the unique and very significant Bevis Marks synagogue. This is a building of immense historic importance and it will be completely overshadowed by the proposed tower. I urge the planners to think again and protect this important part of our heritage.	NO	Public Access website	05-May-24
24/00021/FULEIA	Son	Michael	I object to the building of yet another office block in the 1 sq mile of the City of London. It would be a a tragedy for another historical building to be destroyed.	NO	Public Access website	05-May-24
24/00021/FULEIA	Hilsenrath	Alex	This is completely unacceptable. This building will have a massive negative impact on the Bevis Marks synagogue, which has stood at this location for over 300 years. It is still in use today! Such an imposition on the skyline currently visible to congregants is incomprehensible.	NO	Public Access website	05-May-24
24/00021/FULEIA	Baharier	Michelle	The historic site of Bevis Marks must be prtected, it is one London's oldest buildings ...thess new builds will damage it and London's Jewysh history.	NO	Public Access website	06-May-24
24/00021/FULEIA	Levy	Raymond	As a Jew and a member of the public I am strongly opposed to this development next to Bevis Marks one of the oldest synagogue in Europe and the oldest in the UK. To proceed would be an act of great vandalism. Incidentally this form does not allow me to insert my title of Emeritus Professor	NO	Public Access website	06-May-24
24/00021/FULEIA	Levy	Raymond	As a Jew and a member of the public I am strongly opposed to this development next to Bevis Marks one of the oldest synagogue in Europe and the oldest in the UK. To proceed would be an act of great vandalism. Incidentally this form does not allow me to insert my title of Emeritus Professor	NO	Public Access website	06-May-24
24/00021/FULEIA	Ereira	Angela	I strongly object to the new proposal to build an extremely tall building close to the Bevis Marks Synagogue. It is a Grade 1 listed building in a conservation area. The new tower will block the sky view and overshadow the synagogue.	NO	Public Access website	06-May-24
24/00021/FULEIA	Leigh-Wood	Oliver	This application, as with the previous two for this site, should be turned down. The synagogue one of England's most important religious buildings, is listed grade 1 and Holland house grade 11* and both are in the newly created conservation area. The setting of both will be severely and permanently compromised by the proposed new tower.	NO	Public Access website	06-May-24

24/00021/FULEIA	Shapiro	Adam	A 45 storey tower will completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community. They propose to restore the Listed Holland House[1] and turn it over to various uses which are claimed to be of community benefit. Whilst the restoration of this building is to be welcomed, the claims about the community value of the uses must be viewed with great scepticism. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and	NO	Public Access website	06-May-24
24/00021/FULEIA	Martin	Frank	I comment as a member of Bevis Marks Synagogue, where my family has prayed and been an integral part of the community since it was opened in 1701. Indeed some 14 continuous generations have been married there. This development is in a newly created conservation area and goes completely against its objects. The proposed monstrosity will leave the Synagogue completely in shadow and will impede services which are reliant on seeing the moon. It does not do the City any service to see how planning rules within conservation areas which the Corporation itself has put in place can be flouted at will. Finally the developers are being disingenuous in the "amenities" they are offering which they admit are being offered to try to mitigate the disastrous effect this will have on Bevis Marks and which would in any event form part of any modern development	NO	Public Access website	06-May-24
24/00021/FULEIA	Richardson	Joanna	The proposed development would have a very significant negative impact on Bevis Marks synagogue, a highly important listed building, as well as in the other buildings in the conservation area in which the synagogue stands.	NO	Public Access website	06-May-24
24/00021/FULEIA	Billinghurst	Keith	What is the point of the Creechurch Conservation Area if permission is granted to erect a building of such an overpowering nature as this? The City's planning policy states that tall buildings are inappropriate within conservation areas.	NO	Public Access website	06-May-24
24/00021/FULEIA	Evans	Chris	It's a historic building been standing a very long time. In fact it will still be standing when all these modern monstrosities have long gone. We don't want it destroyed. Go build your plastic tower somewhere that the sun doesn't shine. We are sick of losing our heritage to greedy developers who don't have an ounce of talent between them. Leave the synagogue alone. If it was a mosque you wouldn't touch it.	NO	Public Access website	06-May-24
24/00021/FULEIA	Gower	Judith	This is a historic synagogue and should be left alone. There should not be any building around it. It holds records from many synagogues that no longer exist such as the one my great grandfather worked at plus many of the records for my father's family.	NO	Public Access website	06-May-24
24/00021/FULEIA	Steinberg	Susan	Opposition to Application 24/00021/FULE1A Application almost unchanged since last submission was refused and does not remain in keeping with the conservation of a Grade 1 listed building which is also in a conservation area The proposed tower to the synagogue's immediate south would dominate the protected setting of the synagogue and would severely limit the southern daylight view The proposed tower would affect the ambience of the synagogue and would have a negative impact on the Heritage and Education Visistor Centre due to welcome many visitors from around the world later in the year.	NO	Public Access website	06-May-24
24/00021/FULEIA	Kessler	Charles	The proposed tower is completely out of character with the site and will overwhelm the local historic buildings In particular, the world famous Bevis Marks synagogue will be overshadowed, thus losing a jewel in the crown of the city landscape. The growth of the City of London depends on a sensible and thoughtful balance of new buildings in their setting with existing. This tower is completely out of line with all idea of design and feel of the area and should not be allowed	NO	Public Access website	06-May-24
24/00021/FULEIA	Hepher	Margaret	I object strongly to this skyscraper. It is deeply inappropriate in this location, given its proximity to the historic synagogue and its location in a conservation area and its effect on the setting of the Tower of London. I hope that the City Corporation will refuse this planning application. The Corporation has a duty to protect its unique heritage not only for today, but also for the generations of the future.	NO	Public Access website	06-May-24
24/00021/FULEIA	Shear	Hugh	I strongly object to this development which is very little changed since it was rejected a couple of years ago. It will overshadow the grade 1 listed Bevis Marks Synagogue and take the daylight away from the building during most of the day. I thought this was now a conservation area and it would be protected from such radical redevelopments.	NO	Public Access website	06-May-24
24/00021/FULEIA	Edwards	Jennifer	My husbands grandparents were married at Bevis Marks .He visits there often remembering his grandmother's Spanish / Portuguese name of Corre They were persecuted then. Much like today How dare the council even consider pulling down a much loved HISTORICAL BUILDING .Shame on you	NO	Public Access website	06-May-24
24/00021/FULEIA	MacNeil	Chris	Sir, Madam As a Christian and prospective City of London Tour Guide, I object to the application for a building well over 10 times the height of Bevis Marks Synagogue being erected and thus compromising the intrinsic benefits that the building holds to the Jewish community and the wider City as a while. The Christian faith has seen encroachment of modern City buildings on its incredible architectural legacy. As such Tour Guides, amongst the wider faithful, are beginning to struggle to enjoy these buildings from both outside as well as inside. The Bevis Marks Synagogue is already in an enclosed space. It would do the City immense disservice to allow a huge building to provide further distraction from it, and its history which is so intertwined with that of the City itself. Chris	NO	Public Access website	06-May-24

24/00021/FULEIA	Kindelan	Adam	Why is there such a furore over sunlight? Bevis Marks synagogue is in such a built-up area that this tower would have less of an effect on it than, say, a few extra overcast days each year. (This is especially true since the proposal's redesign, which is shorter and more slender to minimise its shadow.) Refusing the skyscraper on such grounds would be no more reasonable than somehow outlawing clouds, or legislating for more daylight during winter months. I hope the City planners will approve the proposal on the basis of its design strengths, and ignore the objectors' exaggerations. Why is there such a furore over sunlight? Bevis Marks synagogue is in such a built-up area that this tower would have less of an effect on it than, say, a few extra overcast days each year. (This is especially true since the proposal's redesign, which is shorter and more slender to minimise its shadow.) Refusing the skyscraper on such grounds would be no more reasonable than somehow outlawing clouds, or legislating for additional daylight during winter months. I hope the City planners will approve the proposal on the basis of its design strengths, and ignore the objectors' exaggerations.	NO	Public Access website	06-May-24
24/00021/FULEIA	Silver	Rachelle	This is a historic building, a synagogue that my great grandparents married in and I use to Allen's when I lived in the city of London . We need to preserve the view and area, this is crucial part of the history of immigrants into London, the Jewish immigrants contributed so much to the city . My great grandfather was an alderman of the City , he was so proud of being one. Let's not block all beautiful historical buildings with skyscrapers, progress is great but we can't move forward without acknowledging our heritage and our past. I'm 73, but I remember houndsditch as a thriving wherehouse area , my family had Jandow, my father and grandfather traded in Cutlet street Jewlery market, all I can do is pass memories to my grandchildren, but generations should have easy access, and unspoiled views of there heritage, so much of the old has gone.,	NO	Public Access website	06-May-24
24/00021/FULEIA	Scott	Marion	This Grade 1 listed building, serves as an important place of worship for the past 400years. There are so many tall modern buildings surrounding Bevis Marks, that the natural daylight is almost obliterated. This will be the one that will completely obliterate the natural daylight, and ruin the last part of the beauty this building holds. This will make it dark, cold and a wind tunnel. I do totally object to this planning application.	NO	Public Access website	07-May-24
24/00021/FULEIA	Hudson	Lee D		N/A	Email (attached in DC- received by email file)	07-May-24
24/00021/FULEIA	Riella	Samantha		N/A	Email (attached in DC- received by email file)	07-May-24
24/00021/FULEIA	Riella	Samantha		N/A	Email (attached in DC- received by email file)	07-May-24
24/00021/FULEIA	Furness	Sara		N/A	Email (attached in DC- received by email file)	07-May-24
24/00021/FULEIA	McGurran	Deborah	The Bevis Marks Synagogue is a hidden gem in an already overcrowded area. It is important that we retain and protect our historical buildings and protect them for future generations. It is also incumbent upon us, in this generation, to preserve the integrity of these buildings. In order for the Bevis Marks Synagogue to function properly it needs to maintain the aspect of the southern sky simply for daylight access to the building. It is also important to have the space to enjoy for celebrations and to have it available for any ritual practices - without being hugely overshadowed by such an enormous tower block. Is it really necessary to out a massive tower block right there? There will be other sites in the area that will not impinge on such an esteemed, historical and religious site. As well as wholly preserving the city's ancient monuments without compromising their use or aspect, I would also question the carbon footprint of the proposed demolition and rebuild of a such a sky scraper. I do hope this proposal is not approved and the Bevis Marks Synagogue is not impacted in any way by this or any future developments. It should be celebrated for generations to come and not compromised by huge developments nearby.	NO	Public Access website	07-May-24
24/00021/FULEIA	Walker	Marcus	These plans are a direct threat to the continued operation of Bevis Marks Synagogue, the oldest synagogue in the country and the only non-Christian place of worship in the City. While this would be an outrage in normal times, at the moment when the Jewish population of the UK feels particularly at risk, this would shame the City. There is also a very direct threat to the physical safety of the Jewish congregation from having so many people overlooking them, which could not be adequately mitigated, nor could the risk of people within the new tower blocks abusing their position to abuse the congregation racially. The City has a good and growing reputation in supporting the diversity of the City's transient and domestic populations. This would set back the City's reputation by decades.	NO	Public Access website	07-May-24
24/00021/FULEIA	Simpson	Karla		N/A	Email (attached in DC- received by email file)	07-May-24
24/00021/FULEIA	Eisner	Philippe	The Synagogue is a historic building the oldest in Uk . Much treasured by the Jewish community and visited by Schools and public. Its destruction would be a terrible blow to our heritage	NO	Public Access website	07-May-24
24/00021/FULEIA	Waterman	Dawn	I am writing to express my strong opposition to this new application (24/00021/FULEIA). I am a member of British Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application has hardly changed since the last time it was submitted and is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	07-May-24
24/00021/FULEIA	Montgomery	Ruth	This scheme would blight Bevis Marks, the oldest synagogue in the UK, which is also an historic building of cultural interest. In addition it would entail a security risk to users and visitors to Bevis Marks by putting it in direct view of the proposed building. This is not acceptable. Surely such office space could be found elsewhere in the City without such impact on historic buildings?	NO	Public Access website	07-May-24

24/00021/FULEIA	Hogan	Margaret	I am a frequent visitor to London and on a recent visit I learned of the planned blighting of the wonderful, historic Bevis Marks Synagogue, by the developers of 31 Bury Street, whose planned 45 storey, tower will overshadow this Grade I listed building. Their plans show no sense of history, of culture, of religion or even of the financial benefits to be gained by the city of London, through the many tourists who visit Bevis Marks. They are taking a wrecking ball, not only to this most ancient of Synagogues, but also to one of the most historic areas of London. I first saw Bevis Marks when it was included in a cultural tour during a Conference I attended in London some years ago. All the conference delegates looked in awe at this stunning building which was enhanced by the sympathetic surrounding environment. Any authority that would grant planning permission for a new skyscraper which would darken this Synagogue internally and externally and totally overshadow it, would be rightly condemned and vilified by future generations. Could you imagine the planning authorities in Paris doing such a thing? Take note of how they are restoring Notre Dame Cathedral. Beautiful historic buildings cannot be replaced, they are a priceless heritage which we are duty bound to preserve for future generations. Unlike modern buildings, some of which barely last 40 years e g 31 Bury Street. I trust that the London planning authorities will not be left behind and put in the shade by the French planning authorities, who are now leading the way in the preservation and restoration of their historic, religious buildings. Being over shadowed is not to anyone's benefit. Margaret Hogan	NO	Public Access website	07-May-24
24/00021/FULEIA	Isaacs	L	There are enough buildings already offering what Bury house are offering. It's important to respect old historic buildings. Suggest one asks King Charles for his comment.	NO	Public Access website	07-May-24
24/00021/FULEIA	Johnson	Donna	You are trying to erase a beautiful synagogue which is a part of the Jewish community and a place of worship. Considering what is occurring at the moment i find the decision to eradicate a part of my religious history and fellow Jews absolutely unnecessary and hurtful.	NO	Public Access website	07-May-24
24/00021/FULEIA	Bankover	Michael	Object	NO	Public Access	07-May-24
24/00021/FULEIA	Roston	Natasha	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance.	NO	Public Access website	07-May-24
24/00021/FULEIA	Sacks	Rachel	Bevis Marks is the oldest synagogue in the UK and has been used as such for over 300 years. Already, because of local development, it is surround and overshadowed by so many buildings. There is only the southern aspect, which is so important for religious rituals that remains open to the sky. The proposal, similar to a 2022 rejected proposal, is for a 45 story building to be erected blocking the last remaining view of the moon's passage, as well as further diminishing the last remaining natural light into the courtyard and the already dimly lit interior of the synagogue. The synagogue holds huge historical, religious and cultural importance to the Jewish community. Please reject this proposal so that the synagogue can remain fit for purpose for another 300 years. Thank you	NO	Public Access website	07-May-24
24/00021/FULEIA	Renton	D	Out of scale with surrounding buildings, showing no sensitivity to the setting or usage of Bevis Marks. Couldn't see this proposal flying if sited next door to St Paul's, Mansion House or The Guildhall.	NO	Public Access website	07-May-24
24/00021/FULEIA	Segall	Edwin	I am a member of the S&P Sephardi Congregation and a regular worshipper at Bevis Marks Synagogue. I was horrified to learn that a new application has been made to erect a new skyscraper office building on the site of 31 Bury Street, despite the fact that a similar application received so much opposition fairly recently and, even more so, the fact that the existing property and the Synagogue itself are now within a Conservation Area. The proposed building would considerably reduce the already limited amount of natural daylight inside the Grade 1 Listed Synagogue building and would also obscure the vision of the Moon, which is required as part of Jewish worship on the appearance of the New Moon each month. Any major building works, particularly underground excavation, in such proximity to the Synagogue could seriously endanger its foundations and fabric, so soon after the major renovations which have only recently been completed. The City of London already has a plethora of skyscraper office buildings, each one more hideous in appearance tan the the next, and to permit another, in what is now a designated Conservation Area, would be a sad reflection on the City's sense of pride and purpose	NO	Public Access website	07-May-24
24/00021/FULEIA	Wright	carin	There is very little of the old city left , this building is already hidden by skyscrapers, many of which are sitting empty. We do not need another in that location. This synagogue is one of the oldest in this country , probably in Europe . It should be allowed to breathe , Our history and heritage is important . These modern skyscrapers have no character. Can you imagine people paying to visit one in 200 years time ? I doubt it would last that long anyway.	NO	Public Access website	07-May-24
24/00021/FULEIA	Hakkak	Meir	The proposed tower will completely overwhelm Bevis Marks synagogue ,a Grade 1 listed building, denying its right to light. Bevis Marks is where I was married over 20 years ago. The Corporation of London would not contemplate a similar development next to St Paul's Cathedral. I cannot see that the proposed tower in its proposed location is a requirement for "progress" in the City.	NO	Public Access website	07-May-24
24/00021/FULEIA	Smith	Lynda	Leave this beautiful building alone. So many of our historical buildings have been destroyed or tampered with. It is a London landmark. There is nothing beautiful about all these high rise buildings they have no soul.	NO	Public Access website	08-May-24
24/00021/FULEIA	Stein	S	As King Charles prevented building high rises close to st.pauls cathedral as it is an important church same till should be used for the Bevis Marks synagogue. This place of religious status should be allowed to keep some "breathing space" around it. It is already very close to many buildings that are bigger but a very high story building will diminish its existence.	NO	Public Access website	08-May-24
24/00021/FULEIA	Davey	Cathy	Don't do this ,don't dig down ,don't Rob the synagogue of light .The noise ,disruption the sameness of architecture spoiling what was once an interesting old city.	NO	Public Access website	08-May-24
24/00021/FULEIA	SMITH	Maurice	the proposal to build a 41 floor tower next to bevis marks synagogue is utterly ludicrous. it would dominate that Grade 1 listed building ....removing light and obstructing the sky views from the synagogue. I strongly object to these totally inappropriate plans thank you	NO	Public Access website	08-May-24
24/00021/FULEIA	Silverstein	Raymond		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Sassoon	Janette		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Ronish	Yarema		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Morris	Howard	The balance between the utility of a new building as envisaged and the importance of the Bevis Marks synagogue falls squarely on rejecting the application. Bevis Marks is an extraordinarily important building, precious to the country, Anglo-Jewry and Jewish people worldwide and to the City of London. The City is the guardian and steward of its history and heritage and Bevis Marks is a jewel to be respected and honoured. Much of the City's built heritage has been lost over the years through no fault of the City of London, some has to give way to progress in order for the City to stay vital and vigorous to business and commerce but there would have to be something very special, bringing benefits to the City and its inhabitants and visitors far, far more than is offered by this development to justify the harm that will be done to Bevis Marks.	NO	Public Access website	08-May-24

24/00021/FULEIA	Cusack	Andrew	I strenuously object to this application which would have a clear deleterious negative effect on Bevis Marks Synagogue. The synagogue is a site of immense historic importance but even more precious in that it remains in use as a place of worship today. Its history, its present function, and its architectural context would all be severely and negatively impacted by the proposal, which would also run the risk of setting a dangerous precedent should similar cases arise. The application should be rejected.	NO	Public Access website	08-May-24
24/00021/FULEIA	Acres	Tom		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Album	Edward		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Ben Garcia	Jonathan		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Torry	The Rev'd Dr Malcolm		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Jacobs	Everett M		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Sondes	The Countess	I entirely support Save Britain's Heritage work in protecting the Bevis Marks Synagogue. I wish them well with their courageous battle in saving such an important building.	NO	Public Access website	08-May-24
24/00021/FULEIA	Coghill	Andrew		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	Azagury	A E		N/A	Email (attached in DC- received by email file)	08-May-24
24/00021/FULEIA	LL	A	Against it affecting synagogue	NO	Public Access	08-May-24
24/00021/FULEIA	Jones	Roslyn	I strongly object to this renewed and very slightly revised proposed development. Bevis Marks Synagogue, a Grade ! Listed Building, is of huge historic, religious and cultural importance to the Jewish community and the many school groups and tourists who visit it. The synagogue is not a museum but a living and working place of religious worship. Allowing a 45 storey tower to be built which will overwhelm the synagogue is a travesty no matter how well designed it is and its green and sustainability credentials. What is more, having survived many challenges over its long history the deep underground excavation work will more than likely put its entire structure at risk. The reality is that, if allowed to go ahead, this tower block will overshadow both the synagogue and its courtyard and further reduce the daylight which is already minimal. The development site is within the Creechurch Conservation Area. Allowing it to go ahead when current planning policy does not to allow tall buildings in Conservation Areas means there is a direct conflict with the statutory development plan. This application must be refused.	NO	Public Access website	08-May-24
24/00021/FULEIA	Bijl - Meijer	Anna	With this writing I will express my sincere objection for the planning of a monstrous 45 high story building office nearly next to the oldest 'Bevis Marks Synagogue' dating from 1701 and 'Grade 1 Listed ! A 45 high story tower or actually any higher story building than the precious old synagogue, will destroy the southern sky view, which is an essential part of the setting which contributes to the religious ritual in the synagogue. It would also further reduce the already minimal daylight that penetrates the synagogue and making it more difficult to conduct worship. Installing additional electric lighting is not feasible due to the old synagogue's historic nature. The planned development site is within the Creechurch Conservation Area. Current planning policy is NOT TO ALLOW tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The developers are audaciously trying to get a green light for their proposal of a a high sky tower which nobody would ever fancy when walking and admiring the old city's buildings. The proposed '45 high sky building' should be placed in a different location, and certainly NOT in a conservation area next to this beautiful 'Bevis Marks Synagogue'. In the hope you make a wise decision. Yours Sincerely, Mrs. Anna Bijl - Meijer.	NO	Public Access website	08-May-24
24/00021/FULEIA	Austen	Michal	This historic house of prayer depends on the light coming into the building With sky scrapers overshadowing the building, it makes prayer oppressive and difficult.	NO	Public Access website	09-May-24
24/00021/FULEIA	Faulds	Susan	You must not plunge this building into darkness. The building should be celebrated. Many tourists come here. Embrace the heritage and do not denigrate it. It is for these reasons I object to planning permission being granted.	NO	Public Access website	09-May-24
24/00021/FULEIA	palache	ralph	The synagogue is by far the most important jewish site in the UK so the the surrounding area must not overwhelm it.	NO	Public Access website	09-May-24
24/00021/FULEIA	Nicholas	Ronny	The proposed 43-storey tower, being visible from within the synagogue's courtyard, would have a direct and substantially harmful impact on its setting and secluded nature. The sky view from the courtyard has religious importance and allows daylight into the synagogue's beautiful interior. This was a reason for the refusal of a previous tower proposal. I also have major concerns that a building of such a great height would cause harm to the adjoining grade II*-listed Holland House, the 1912 Renown House, for which rooftop extensions are also proposed. A large building of this scale would cast a shadow over multiple highly listed buildings within the Creechurch Conservation Area, including the, 17th-century St Katherine Cree Church and 18th-century St Botolph's, both grade I listed and located at its heart.	NO	Public Access website	09-May-24
24/00021/FULEIA	Lecutier	Louise	The demolition of Bury will mean the loss of both cultural and historical building.	NO	Public Access	09-May-24
24/00021/FULEIA	Sorotzkin	Duche	As a religious Jew, this development will block the natural light that is needed for the oldest synagogue still in use in the UK and as the synagogue relies on natural light, by allowing this development to go ahead, it will cause irreversible damage to a synagogue over 300 years in use and to the whole Jewish community in the UK and to the city of London as whole	NO	Public Access website	09-May-24
24/00021/FULEIA	Gau	Justin	This will plunge the oldest Synagogue in London into the dark. As an Anglican Priest I find that sort of thoughtless brutality of another faith's place of worship repugnant.	NO	Public Access website	09-May-24
24/00021/FULEIA	Hardy	Patrick	Speaking as somebody who worships every week in the City of London, it is disturbing to see that the City is seeking to drive out worshipers of another faith from the only non-Christian place of worship in the City. This would have such harmful effects on the civic life of the city, erasing out a religious minority. On top of this, it turns a rare example of history that is alive into history that is dead. This is wrong on so many levels and shouldn't be considered in our multi-faith city	NO	Public Access website	09-May-24
24/00021/FULEIA	Brooks	Iolo	This development is completely out of character and scale for a conservation zone and dwarfs and impacts the light and amenities of a working 300 yea old historic synagogue, how can you think it is appropriate?	NO	Public Access website	09-May-24
24/00021/FULEIA	Harrison	Sarah	Permission must not be granted for this project in a conservation area. In addition it is important to recognise that the life of the City includes religious worship as well as shops and cafes.	NO	Public Access website	09-May-24

24/00021/FULEIA	Marks	Jackie	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and its historical importance to British Jewry and am upset to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application is hardly any different to the last application and the same objections still stand. It is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK with its forthcoming important Heritage and Education Visitor Centre. The proposed new tower would dominate the protected setting of the synagogue and would overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	09-May-24
24/00021/FULEIA	Bye	Georgina	Detrimental to the historic nature of the area and in particular to Bevis Marks synagogue.	NO	Public Access	09-May-24
24/00021/FULEIA	Stapleton	Mariella	I object to the bevis marks being teared down. It is one of the oldest synagogues and my grandparents got married there. It holds a lot of significance to us at Jews in the uk and at this moment in time we need our religion to stand strong and to feel part of something. The bevis marks is a staple in the community and we must protect it.	NO	Public Access website	09-May-24
24/00021/FULEIA	Stapleton	Laura	The bevis marks is a staple in the Jewish community. I am from Manchester and feel the weight of it being torn down. It is important we protect this synagogue as it is important to us all!	NO	Public Access website	09-May-24
24/00021/FULEIA	Devine	Kathryn	It is unthinkable that this beautiful and historically significant building should be threatened yet again by a monstrous and inappropriate development. You would not allow this near a cathedral, so why here? At this time more than ever we must protect our Jewish community and its places of worship.	NO	Public Access website	09-May-24
24/00021/FULEIA	Purcell	Mark	An absolutely deplorable proposal - that this wonderful building, a key place for Anglo-Jewry, the centre for a living community, an incredibly beautiful and important building, and the sole non-Christian place of worship in the City should be overshadowed in this. As a Freeman of the City I object in the strongest terms.	NO	Public Access website	09-May-24
24/00021/FULEIA	LAX	JACOB	I have been a regular visitor to Bevis Marks Synagogue, for some 40 years. It is a beautiful building, about 350 years old,. I understand that the proposed development will take a few years to complete. During this tome, there will be a continuous noise that goes with building works, especially on the scale of the proposed project. Bevis Marks Synagogue still holds daily services, these would be disrupted by the noise. It is not well insulated against sound. I am also concerned about the effect of the proposed project on the natural light that the Synagogue benefits from. It was built in the days when candles were used to light up the main parts, assisted by sunlight. there are now a limited number of electric lights, to provide some extra light, but this is a minor source as the Trustees wish to retain the ambience of the Synagogue as much as possible. Finally, the new development will not blend in with the buildings around it. Whilst I am not against modern architecture, I would expect building permission to be limited to 12 floors maximum.	NO	Public Access website	09-May-24
24/00021/FULEIA	Binke	Adrian	save Bevis Marks should not be desacrated by tall buildings which will hide its beauty it's the oldest synagogue in England should be there for its congregation to pray in solitude	NO	Public Access website	09-May-24
24/00021/FULEIA	Artoon	Sydney	This proposal for a 43 storey building will cause extreme traffic congestion and possibly accidents in a already crammed area where there is only limited space 4 storey basement space can architects guarantee that is safe !! Light will be affected, the area will be in near perpetual darkness !!	NO	Public Access website	09-May-24
24/00021/FULEIA	Jacobs	Tony	This proposal will cause enormous issues to Bevis Mark synagogue. It is not only a grade 1 protected property but it is in constant use and needs daylight to be able to run religious services and the admin surrounding it	NO	Public Access website	09-May-24
24/00021/FULEIA	Joseph	Natalie	One of britains oldest historical sites does not need to be overshadowed by what will probably be an eyesore of an apartment block. Completely unnecessary.	NO	Public Access website	09-May-24
24/00021/FULEIA	Franz	Benjamin	Bevis Marks is an ancestral congregation for my family. It's a glorious well preserved building that requires natural lighting to truly frame its glory. To build 43 stories next to it would be to create a dark, depressing environment. It would rob Bevis Marks of its wonder. Do not build this building. When next I come to London, I wish to experience the holy congregation in all its natural splendor.	NO	Public Access website	09-May-24
24/00021/FULEIA	Morales	Eva	Bevis Marks is a treasure, a beautiful and historic synagogue that is the oldest synagogue in all of Europe in continuous operation. To plunge it into darkness is almost a perfect metaphor for the decline of Jewish life in Europe, and should not be considered. I was in City of London to pray at this holy place for Passover and it was an amazing experience that I will happily recommend to any fellow Jews I come across. Please allow this community to flourish.	NO	Public Access website	09-May-24
24/00021/FULEIA	Collins	Lauren	This is an atrocious plan which would have a hugely detrimental impact on the Bevis Marks Synagogue, as both a place of worship and as a building of vast cultural and historical significance. Jewish Londoners and visitors must be allowed to use the synagogue with sufficient light and not be plunged into darkness by this pointless building. The intended development is ugly and totally unnecessary - London simply doesn't need another dominating building like this, totally out of proportion with its neighbours and the skyline. If it goes ahead it will be a huge insult to the Jewish community, and to anyone who values London's priceless heritage, history and culture.	NO	Public Access website	09-May-24
24/00021/FULEIA	Kaiser-Chen	Aaron	To whom it may concern, I am writing to register my objection to the proposed structure. As a member of the Bevis Marks Synagogue community, a member of the synagogue choir, and lay-cantor, I find it incredibly tiresome and antisemitic that structures such as the proposed one continue to disregard me and my fellow congregants, and treat us as undeserving of human dignity, seeking rather to deprive us of the very little natural light we do enjoy during regular worship. Bevis Marks Synagogue is both a living community and an integral part of British history - both Jewishly and nationally. It is unfathomable how developers can continue to bring forward proposals that actively seek to plunge both bonafide, thriving communities and history itself into darkness. Given that the community has received recognition from the Heritage Lottery and patronage from the King himself, it baffles the mind how this can be allowed to continue. To even insinuate that the proposal would not adversely affect the community is not only an insult to us as regular worshippers, but to the work of those who carried out any such survey. Such proposals have been brought and rejected before. In light of the proposed conservation area, and the international rise in antisemitism, it is astonishing that this proposal can even be considered. I urge its withdrawal posthaste. Kind regards, Aaron Kaiser-Chen 48 Queens Avenue, London N3 2NP	NO	Public Access website	09-May-24
24/00021/FULEIA	Summers	Dominic	The construction of a 43-storey tower block next to a building that is so important culturally, historically and for religious reasons is almost unimaginable in its insensitivity. It would have a very damaging effect on the cultural heritage of the area. But, what is worse, would be an insult to the Jewish community. This is culturally and historically the most important synagogue in the UK and one of the most important in Europe. Would such a tower be permitted only metres from St Paul's?	NO	Public Access website	09-May-24
24/00021/FULEIA	Ani	Alex	This is a very bad idea - will be massively detrimental to Bevis Marks Synagogue.	NO	Public Access	09-May-24

24/00021/FULEIA	Shenton	Caroline	The impact on worship at the historic Bevis Marks synagogue would be devastating by blocking significan portions of the sky, in addition to the damage its historic setting. Has no equality impact assessment been done at all ?	NO	Public Access website	09-May-24
24/00021/FULEIA	Doherty	Helen	Why does London need another monster skyscraper and so close to a beautiful old building like Bevis Marks it will spoils the beauty tranquility of this old historic building shame on you for even thinking about it	NO	Public Access website	09-May-24
24/00021/FULEIA	de Solla	Wendy	I'm reaching out from across the Atlantic (Canada) to object to the Planning Application reference 24/00021/FULEIA. The proposed structure would alter forever the natural light which streams into the Bevis Marks Synagogue. The Synagogue should be preserved and protected from unnecessary high rise developments around it (as any other historical building would or should be). Why am I, a Canadian (and a non Jewish person), interested in this? I am speaking out on behalf of my Jewish ancestors who attended this Synagogue and delivered sermons there. My ancestors are gone but their descendants have a responsibility to speak out against threats to this historical building. Please listen to our plea and don't let money destroy the beauty of this old building! Thank-you.	NO	Public Access website	09-May-24
24/00021/FULEIA	Ansell	Charlotte	It would be an absolute travesty to allow this 45 storey tower to overwhelm Bevis Marks Synagogue, a grade 1 listed building in a Conservation Area, which is incredibly important to both the history of the Jewish community in London as well as those that continue to pray there. Such a building would never be allowed beside other important buildings for other faiths and the same should be the case for Jewish people. It would absolutely destroy the southern sky view of the synagogue, which is a very significant part of the setting and would affect important religious rituals, shadowing the synagogue and its courtyard and reducing the already limited daylight into the synagogue. It is also currently not clear that the proposed new building has benefits that in any way outweigh the harm that building it would cause both physically and culturally. Has the Jewish community not been harmed enough? Conservation areas and Grade 1 listings are there for a reason! I urge you to reconsider.	NO	Public Access website	09-May-24
24/00021/FULEIA	Mocatta	David	The Synagogue is unique and should be cherished and respected not plunged into darkness. Please protect Britain's heritage.	NO	Public Access website	09-May-24
24/00021/FULEIA	Terpilowski	Sue	Damage to light for Beavis Marks Synagogue	NO	Public Access	09-May-24
24/00021/FULEIA	Ruff	Chris	The disruption to the synagogue here seems to be catastrophic, the loss of light and the effect this will have appears to be obvious. The City has a great heritage and places of importance such as this should be protected. We have lost plenty in our City of London in recent years and we can well do without another casualty.	NO	Public Access website	09-May-24
24/00021/FULEIA	black	keith	This development will have an awful impact on the the grade 1 listed bevis marks synagogue, an impact that would not be acceptable for any other building of this significance. the unnecessary demolition of 31 bury street is unacceptable from an environmental perspective.	NO	Public Access website	09-May-24
24/00021/FULEIA	Nathan	Gia	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I have visited the beautiful Bevis Marks' Synagogue for weddings and events and I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	09-May-24
24/00021/FULEIA	Hassan	Alexandra	Bevis Marks is a listed building, part of London's rich Jewish history and must be protected. Building such a high-storey building next to it will overshadow it, removing natural light and affecting the communal space that Bevis Marks is soon opening to the public. Please rethink your plans.	NO	Public Access website	09-May-24
24/00021/FULEIA	Greenberg	Susan	This project makes a significant impact on the light, space and overall environment of the historic Bevis Marks synagogue.	NO	Public Access website	09-May-24
24/00021/FULEIA	Max	Jonathan	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community. They propose to restore	NO	Public Access website	09-May-24
24/00021/FULEIA	Fawcett	Robin	The impact on the synagogue nearby would be appalling and unconscionable. Faith communities must be protected, especially given their heritage in our ancient city.	NO	Public Access website	09-May-24
24/00021/FULEIA	Marsh	Alan	A building of this scale and height is entirely inappropriate in close proximity to Bevis Marks Synagogue, London's oldest place of Jewish worship, which would be completely overshadowed by such a development. It would be extremely unfortunate, to say the least, if London's increasingly beleaguered Jewish community were to be forced to leave their spiritual home. Planners need to look very closely at the context of proposed developments, as here, and ensure that any new building is sensitive and applicable to the local environment, especially in crowded spaces such as this. This proposal is not.	NO	Public Access website	09-May-24
24/00021/FULEIA	Lawrence	Harvey	It completely obliterates the oldest UK Synagogue Bevis Marks and as it's not a Mosque I consider this planning application to be Racist and against the Public Interest of not destroying the look of sacred buildings	NO	Public Access website	09-May-24

24/00021/FULEIA	Scott	Lisa	The proposed building would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. My understanding is that because of the historic nature of the synagogue, installing additional electric lighting is not feasible. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?	NO	Public Access website	09-May-24
24/00021/FULEIA	Davila	Patricia	The impact this would have on the natural light of Bevis Marks Synagogue is totally unacceptable. It is a major part of the cultural heritage of the Sephardi and wider Jewish community of this country and allowing it to be forced into darkness would be an unacceptable failure by the City. In the era of inclusivity and equality we find ourselves in, to exclude our community's need to protect our history would be ignorant at best and in any event a breach of the Equality Act given the protected nature of religious minorities in this country. How much more so, particularly given the relatively small numbers of Sephardi Jews in the UK today, does this apply to the still-active community at Bevis which granting this permission would hurt in the immediate term.	NO	Public Access website	09-May-24
24/00021/FULEIA	Rose	Adam	Bevis Marks Synagogue, Europe's oldest synagogue in continuous use, is an important part of Jewish heritage in the UK. This proposal will destroy the light available to the synagogue, making its use deeply depressing, and damaging the spiritual aspect of the site.	NO	Public Access website	09-May-24
24/00021/FULEIA	Simon	Rashi	This application menaces the historic Bevis Marks synagogue and threatens to completely overwhelm it. Should a place of worship which survived the Blitz and so much more succumb to the callousness or greed of City developers and a pliant or disinterested council? This would be a historic tragedy. Do not allow it to happen on your watch.	NO	Public Access website	09-May-24
24/00021/FULEIA	Lent	Paula	As an art historian and a women who has spent all her school life and working life in the City of London I object to the beautiful historic building and synagogue Bevis Marks will be totally overshadowed by this building.	NO	Public Access website	09-May-24
24/00021/FULEIA	Vos	Benjamin	Having worshipped at Bevis Marks, I know how beautiful and unique it is in the Jewish world and in the United Kingdom. It bears restating that Bevis Marks is the only place of Jewish worship in the City, and the oldest functioning non-Christian sanctuary, by centuries, of any non-Christian denomination in Greater London. As someone who has in my professional capacity developed a walking tour of Jewish London, I feel that the synagogue is of immense historical, aesthetic, cultural and even symbolic importance. Plans to wear down objectors to developers damaging the ancient synagogue's right to light, cannot be allowed to succeed. The synagogue's large clear windows need natural light. Developments must not block the sunlight and must not. Please do not allow the skyscrapers to damage the beauty and grandeur of this special place.	NO	Public Access website	09-May-24
24/00021/FULEIA	Fraser	Lola	This construction will completely block the light and dwarf Bevis Marks Synagogue. The oldest synagogue still in constant use in Britain. If hiven the go ahead it will have an horrendous effect on the synagogue	NO	Public Access website	09-May-24
24/00021/FULEIA	Leffman	ADELE	Bevis Marks synagogue is part of the fabric of the City of London as it has functioned since 1701. Your proposed scheme will destroy our ambience and ruin the Rabbi's house and the light in the courtyard where his son plays. This currently bright space is used by us in spring and summer for religious functions and fetes. Your proposal does you no credit. We have an elegant building with just enough privacy to make it viable. If we are dwarfed and thrust into darkness you will be eroding the heart of London Jewry. There is no excuse for your attitude, of breaking rules to suit yourself. We have contributed considerably to this city and deserve to be treated with respect . Not walked over as if our existence was of no importance. If you have a shred of decency you will not proceed with this scheme which does you no credit on any front. Your flouting of the rules of a conservation area beggars belief.	NO	Public Access website	09-May-24
24/00021/FULEIA	Samuel	Jonathan	It would be a travesty were this proposed massive Tower be allowed to overshadow and hem in Bevis Marks Synagogue, the ildest Synagogue in Britain. The synagogue needs light and a view of the heavens.	NO	Public Access website	09-May-24
24/00021/FULEIA	SOLOWAY	stuart	a 45 storey development adjacent to the oldest and continually used synagogue in London would completely overshadow this grade 1 listed building and destroy the historic character of the neighbourhood and synagogue. It would impair the impact that the building has on the historical background of the City of London and the development of the Jewish population in London and England .	NO	Public Access website	09-May-24
24/00021/FULEIA	Pell Scholes	Daisy	This will ruin a unique and historic atmosphere and a beautiful, important architectural experience.	NO	Public Access	09-May-24
24/00021/FULEIA	Duke	Marc	There are very few original pieces of Jewish history left in London don't sacrifice this one for the cause of commerce there has to be another way.	NO	Public Access website	09-May-24
24/00021/FULEIA	Bendahan	Yael	A 45 storey tower would overwhelm the stunning synagogue, a Grade 1 Listed building of enormous historic and cultural significance, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting, and overshadow the synagogue and courtyard for much of the day, It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. .	NO	Public Access website	09-May-24
24/00021/FULEIA	Pell Scholes	Barney	I strongly object to this proposal to build a 43 storey building that would have a significant detrimental effect on the historic Bevis Marks synagogue. It is wildly inappropriate to be considering a development that would block off light and important sightlines to a building as culturally and historically significant as Bevis Marks. This is perhaps the UK Jewish community's most significant synagogue, please treat it with the respect it deserves. A previous proposed development that would have had a similarly detrimental impact on Bevis Marks met with public outrage and was stopped as a result. Why would you make the same mistake again? You would not consider allowing a similar development next to other culturally and religiously significant buildings, such as St Paul's Cathedral, so please treat Bevis Marks with the same degree of respect. I object to this development and urge you not to progress it further.	NO	Public Access website	09-May-24
24/00021/FULEIA	Abboudi	Maurice	Bevis Marks is a historical landmark in the City. It has the most fabulous courtyard with stunning views of the moon and the stars. This will be overshadowed by another high rise. On a personal note we were supposed to rent the ground floor and first floor of this building. We spent over #25,000 on plans and architects and the landlord pulled out at the last minute. We found out that we had been strung anling all the way and the landlord was planning to apply for redevelopment of the site. Needless to say I do not support redevelopment of this building.	NO	Public Access website	09-May-24
24/00021/FULEIA	Wiesenberg	Mindy	This development will completely overwhelm Bevis Marks which is one of the most important and oldest synagogues in Europe. It is totally out of character with the immediate area and should be denied planning permission.	NO	Public Access website	09-May-24
24/00021/FULEIA	Lee	Marilyn	This building is of great significance not only to the Jewish community but to people who have an i terest in historic buildings. Bevis Marks hss been on this spot for 323 years. It needs the natural light for religious reasons. By erecting a skyscraper so near to it which will blot out the natural light is astonishing! In 2020 and 2021 there was considerable opposition to planning applications for two nearby skyscrapers which would cut off natural light to the synagogue, threatening its ongoing use for daily services. The community had said the historic synagogue faces a closure threat as the loss of light would render services "almost impossible." Plans to build both tower blocks were ultimately denied by City of London councilmembers.In 2023, the Creechurch Conservation Area was approved, which should protect Bevis Marks and Grade II* St Botolph's-without-Aldgate from development. So what has happened since then. I oppose the erecting of any skyscrapers anywhere near this beautiful building.	NO	Public Access website	10-May-24

24/00021/FULEIA	Winston	Anthony	This historic place of worship is the only synagogue in the City. It must be protected and preserved in its current form and not suffocated by surrounding development.	NO	Public Access website	10-May-24
24/00021/FULEIA	Hasenson	Phillippa	You'll block the natural light into europes oldest synagogue which is lit by candlelight and destroy the ability to use the building!!!	NO	Public Access website	10-May-24
24/00021/FULEIA	Williamson	Donald	If this development is given approval by the Corporation of London, it will be a sad day for this most beautiful synagogue, the City's very own Cathedral Synagogue. Young professionals from the area have given Bevis Marks renewed purpose. It is still a synagogue, the longest continuously serving synagogue in Europe and one of the longest continuously serving synagogues in the whole world. I lived for many years in the Stepney/Whitechapel area and knew of Bevis Marks. The bomb blast at Baltic Exchange I remember very well where I was living, just a mile to the east of there. Bevis Marks survived that blast, survived another, survived the Blitz and has survived the ever-encroaching developments nearby. This proposed development is a real risk to Bevis Marks as a house of prayer. "Kahal Kadosh Shaar Asamaim", the "Holy Congregation The Gates of Heaven", is a place of quiet contemplation on weekdays, not just a tourist attraction, and serves an observant community on Shabbos. It is rightly thought of as the City's Cathedral Synagogue by the S&P and by the wider Jewish community. There is no other like it and it deserves to be safeguarded in the present and for future generations. May the Corporation's committee be guided by HaShem to reach a just decision in this matter.	NO	Public Access website	10-May-24
24/00021/FULEIA	Weiss	Annie	The proposed building is disastrously large and would destroy the current atmosphere of the synagogue and affect the experience for current and future congregants.	NO	Public Access website	10-May-24
24/00021/FULEIA	Brown	Jeremy	The building of a tall building over shadowing Bevis Marks is outrageous. The elimination of natural light will turn the synagogue and adjacent area into darkness. The first attempt was rejected,and the same must happen to this second attempt.	NO	Public Access website	10-May-24
24/00021/FULEIA	Lerner	David	The centuries-old Bevis Marks Synagogue is one of the most significant religious landmarks in the UK, and arguably in Europe. Not only does a local congregation worship there, but people travel from around the world to visit. The synagogue's historic interior is lit by candles and natural light, which contribute to its feeling of sacred space. The proposal will literally overshadow the synagogue, destroy the spiritual atmosphere, and very adversely impact the experience of visiting and worshipping there. I hope you will not approve the construction of such a large adjacent tower.	NO	Public Access website	10-May-24
24/00021/FULEIA	Dwek	David	As a member of the S&P the 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community	NO	Public Access website	10-May-24
24/00021/FULEIA	Marks	Michael	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a member of the U.K. Jewish community I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	10-May-24
24/00021/FULEIA	Wilson	Mark	The Bevis Marks synagogue is a monument to history and Jewish heritage in England. Three hundred and fifty years of it. It is a wonderful building and is simply stunning. I've also been inside a few times and had moments of reflection in there. On one visit, I was lucky enough to have been shown around by the Rabbi, and noted the worshippers and the community it is. This is a special building. Bevis Marks should not be cut off by the awful darkness of a development, which is not needed and will make no contribution to the life of the City of London or improve it. Do not let developers ride roughshod over culture, religion, history or our heritage.	NO	Public Access website	10-May-24
24/00021/FULEIA	Loftus	Richard	The proposed development will irrevocably change the setting of this listed building which is a unique Grade 1 listed synagogue whose setting and daily use is a fundamental asset of the Jewish community in London and Great Britain at a time when anti semitism is rife .	NO	Public Access website	10-May-24
24/00021/FULEIA	Ta	David	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	10-May-24

24/00021/FULEIA	Holt	Jason	I'm writing to express my strong opposition to this new application I'm a worshiper of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	10-May-24
24/00021/FULEIA	Lester	Jonathan	We attended a service at the Synagogue earlier this week and it is not only a beautiful period building but an oasis in the city of ugly skyscrapers. It attracts audiences from people interested in the areas history and what the Synagogue represents being the religious haven available to Jews escaping persecution 300 years ago. Any adjacent building works and imposing tower would completely undermine the Synagogue and could potentially damage it.	NO	Public Access website	10-May-24
24/00021/FULEIA	Stubbs	Ian	I objected to the previous application too. The planned 45 storey tower would completely overwhelm the synagogue, which as you are aware is a Grade 1 Listed building of enormous historic and cultural significance not only to the city but to the whole country. Such a building would be allowed next to St Paul's cathedral, so why is the synagogue not given the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the qualities it contributes to religious ritual, the view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is here a conflict with the statutory development plan. The City Corporation is required to identify locations suitable for tall buildings and has I understand done some work on this, but there is much more work to be done, and that work has to be assessed by an independent inspector which is unlikely to be complete before late next year. The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny many of these such as being car free, demonstrating holistic environmental design, having consolidated deliveries, already happen as standard practice with lots of applications nationwide.	NO	Public Access website	10-May-24
24/00021/FULEIA	Loftus	Nicola	This building would overwhelm and dwarf the historical synagogue next to it, this is an important heritage building for British Jews and should be afforded the same consideration as a cathedral.	NO	Public Access website	10-May-24
24/00021/FULEIA	stephenson	judy	Modern tall buildings in the distance can enhance old ones, but when they overshadow they make the old buildings invisible from the outside, and dark on the inside. The streets here are narrow (even Bevis Marks itself), you don't want to feel threatened by a building as you walk in its shadow. js	NO	Public Access website	10-May-24
24/00021/FULEIA	Mellman	Susan	You must not plunge this building into darkness. The building should be celebrated. Many tourists come here. Embrace the heritage and do not denigrate it. It is for these reasons I object to planning permission being granted.	NO	Public Access website	10-May-24
24/00021/FULEIA	Lerner	Ashley	Bevis Marks is a British and Jewish community asset and a 45 storey building next to it is absurd. I cannot believe other grade 1 listed buildings would be subjected to such a neighbouring property.	NO	Public Access website	10-May-24
24/00021/FULEIA	Ognall	Geoffrey	This proposal is unacceptable and inappropriate to the historic Bevis Marks Synagogue blocking light and in my view desecrating the surround	NO	Public Access website	10-May-24
24/00021/FULEIA	Nono	Paola	- a previous application for a 48-storey building was rejected. The current application is not significantly different, and therefore all the reasons for rejecting the previous application still apply; - the proposed development is in a Conservation Area, where tall buildings are not permitted, and is therefore in direct conflict with the statutory development plan. It's outrageous that the City Corporation is proposing to scrap the ban on tall buildings in Conservation Areas and thereby damage the setting of all heritage assets in the area and compromise the qualities of Conservation Areas; - the development would completely overshadow and have a huge impact on the Bevis Marks Sinagogue, a building of great cultural significance and Grade I Listed; - the existing building at 31 Bury Street, which is only 40 years old, is capable of being refurbished and its unnecessary demolition would result in CO2 emissions.	NO	Public Access website	10-May-24
24/00021/FULEIA	Graff	Michelle	Why would you all to plunge this building into darkness. The building should be celebrated. As a Jewish listed site in full use Many tourists come here. Please Embrace the heritage and do not denigrate it. Would you wish a listed Christian place of worship to be put into this position It is for these reasons I object to planning permission being granted.	NO	Public Access website	10-May-24
24/00021/FULEIA	Shaanan-Eisen	Naomi	- A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. - It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? - It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. - The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. - It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.	NO	Public Access website	10-May-24
24/00021/FULEIA	Freedman	James	This proposal is not materially different from the tower which was rejected a few years ago. A 45 storey tower will completely overwhelm Bevis Marks synagogue, a Grade 1 Listed building of enormous historic and cultural significance. The view of the sky is an essential part of the setting of the synagogue, and would be completed destroyed. The Hebrew calendar is lunar and losing the view of the moon's passage across the sky, which would be blocked by the proposed tower, would irreversibly detract from the amenity of the synagogue for payer and contemplation. If permitted, the tower would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. The developers argue that they are providing lots of planning benefits that outweigh the harm to the synagogue. They acknowledge that harm to the synagogue will result from an approval. Further, the alleged benefits cited do not stand up to scrutiny and this flawed argument demonstrates a lack of understanding as to the synagogue's value, role and function. As someone who has attended the synagogue over a period of more than fifty years, I oppose this application for such a massive, overwhelming development in the strongest possible terms.	NO	Public Access website	10-May-24

24/00021/FULEIA	LEVY	DANIEL	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.	NO	Public Access website	10-May-24
24/00021/FULEIA	Wober	Jonathan	This proposed development of a 43 storey building just to the south of Bevis Marks synagogue would further reduce the daylight reaching the UK's oldest Jewish place of worship. The synagogue, an active place of worship and the only one in the City that is not Christian, is also hugely important heritage asset. In regular use, it relies heavily on natural light and candles and has already suffered a significant reduction in daylight over the years due to a number of other tall buildings in the area. As a City of London Guide, I feel very strongly that the unique and diverse history and heritage of the City must be respected and protected, especially concerning a building which has an unbroken three centuries of importance to Britain's Jewish community. Bevis Marks synagogue should be able to look forward to retaining its significance in the City for 300 more years and beyond. The same could not be said of the proposed new development on Bury Street (nor of any other office building in the area). I recognise the importance of new office and commercial space in the City, but not at the expense of the continued well-being of a unique and culturally vital community asset. The previous proposal for a similar, even taller, building on Bury Street was rejected and this proposal must also be rejected for the same reasons.	NO	Public Access website	10-May-24
24/00021/FULEIA	Lerner	Marc	I was shocked and saddened to see that again there is a proposal to erect a new high rise building so close to the oldest continuously used synagogue in Britain dating from 1701. It is a listed building and is the cathedral church of Judaism and of great significance to the community. It has many services throughout the year and the view of the moon's passage across the sky and many celestial bodies would be blocked by this new development. It would overshadow the synagogue and its courtyard. The construction of such a large new build may also affect the foundations of the Synagogue building, however much care is taken. The development site is within the Creechurch Conservation Area and current planning policy is not to allow tall buildings in the Conservation area. This policy should not be changed. The current building at 31 Bury Street is only 40 years old and could be refurbished to provide further service for many more years rather than demolished. I very much object to this new development which will affected a much loved building I regularly visit and is visited by dignitaries from all over the world as well as other visitors both from the UK and overseas.	NO	Public Access website	10-May-24
24/00021/FULEIA	Davis	Angela	I find it appalling that you would even consider another monstrosity of a building being built to overshadow an historic part of the City. It is shameful that the area around this historic building isn't being allowed to enhance the area rather than corporate greed taking over to line the pockets of capitalists who care more for greed than the beauty and intrinsic value of the history of the area. So much of the area has been destroyed in the last 50 years, that I feel this application should be turned down to preserve at least a small amount of the area can be saved by the building of yet another monstrous carbuncle	NO	Public Access website	10-May-24
24/00021/FULEIA	Pereira-Mendoza	Marc	In a world where we pay less and less attention to an active preservation of the past and in particular the uniqueness and exceptional history of a building such as Bevis Marks, the Corporation must pause and take stock of the objections surrounding this proposed project. There is no doubt that a 45 floor tower would overwhelm the synagogue optically, physically and crucially from a lighting perspective. There is limited scope to improve the lighting within the synagogue itself given its Grade 1 status and the proposed building would also overshadow the courtyard area which has been used for many years for rituals and celebrations such as weddings (including my own). Furthermore, I understand that the proposed development is within the Creechurch Conservation Area which should not allow for tall buildings and many of the arguments offered by the developer in supporting their application seem somewhat contrived - especially from an environmental and sustainability perspective. Bevis Marks will soon have a museum and visitors centre which has taken years of hard work to accomplish and will sit within the site and the success of that initiative to attract visitors will also be reliant on both the aspect and light falling across the area. More importantly this building serves as a historical gem of unparalleled significance, not just for the Jewish people, but for this country as a whole in the way that it has served as a beacon of light for those fleeing oppression and looking to contribute to broader society - please do not allow the light surrounding it to be extinguished.	NO	Public Access website	10-May-24
24/00021/FULEIA	Swart	Ben	This is one of very few local synagogues close to the city and where I live in London. I have and do come here on high holy days. It has a unique and powerful atmosphere. Dating back 300 years. One of the main reasons it creates such an atmosphere, and powerful spirit, is the light able to flood through the building. To have the surrounding area changed in this way, seems a stark metaphor for how you value the people who visit it.	NO	Public Access website	10-May-24
24/00021/FULEIA	Cotte	Severine	Bevis Marks synagogue is the only non-Christian place of worship in the City. They worship by candlelight and have monthly ritual prayers on the sighting of the new moon, the view of which would be blocked by the new tower. The tower would mean that their courtyard would be in permanent shadow. Standing with our neighbouring faith community and highlighting to the City the importance not just of office workers, but of living communities which have been the heartbeat of the city for centuries.	NO	Public Access website	10-May-24
24/00021/FULEIA	Stamler	Darcy	Proposal is outrageous! I am a heritage preservation professional. A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.	NO	Public Access website	10-May-24

24/00021/FULEIA	Steinman	Sharon	"This site holds immense historical significance and must be safeguarded for future generations. Its uninterrupted vista has been cherished for centuries, integral to its identity. If an iconic landmark like the Tower of London had been compromised by obstructive development, it would undoubtedly face vehement opposition. Neglecting the heritage value of this site would be a disservice to its legacy and the community it serves.	NO	Public Access website	10-May-24
24/00021/FULEIA	Morrison	John	This wonderful historic building would be totally overshadowed,Its right to natural light destroyed,(please note the sanctuary is still light by candlelight). The proposed Development would not be permitted adjacent to St Pauls Cathedral so why adjacent to such an equally historic building.	NO	Public Access website	10-May-24
24/00021/FULEIA	Prever	Danny	Would this action be taken if this was a mosque?? This historic synagogue relies on natural light - reducing this will make it impossible for Jewish people to pray, thus discriminating against them. There is also a high risk of damage to this listed building during construction.	NO	Public Access website	10-May-24
24/00021/FULEIA	Owen	Matthew	The proposed development is completely inappropriate for the area, given it would overshadow Bevis Marks synagogue which is a site of national religious significance which should be respected as such.	NO	Public Access website	10-May-24
24/00021/FULEIA	Bridge	Mark	The proposal will overshadow Bevis Marks synagogue - a building of global significance and one of the most important historic places of worship in London and the UK. It will negatively change the experience of both worshippers and of visitors - at a time when the synagogue hopes to welcome more visitors with improved amenities. The synagogue isn't only of religious and architectural significance but an extremely evocative legacy of London and Britain's history of immigration and integration. Schemes such as that proposed may be appropriate in certain locations but not where they damage a site of such historic, cultural and religious merit. It seems inconceivable that such a proposal would be permitted to blight a cathedral and the response in this case should be the same.	NO	Public Access website	10-May-24
24/00021/FULEIA	Steven	Elizabeth	Once again the congregation of the Bevis Marks Synagogue have to go through this ordeal of asking to save this beautiful building for the sake of greed by developers. Isn't there enough modern monstrosities in the City; which in my opinion are already a bolt on the landscape, let alone I'm sure there are many others empty with office space to let if that is the purpose of this eyesore. STOP this development planning application NOW and for once listen to the public and how they feel. I signed the previous partition to stop such a development near the synagogue and I again sign this for the same reasons. I also repeat my comment, how about creating some green spaces in the City instead on these sites. Give some lungs to the area so that people can rest and breath. Plant some trees! that would be far nicer than a building that blots out all daylight, not only from Bevis Marks but the City and its surrounds in general. Stop making the City of London look like a permanent building site.	NO	Public Access website	10-May-24
24/00021/FULEIA	Hassan	Isaac Samuel	I object in the strongest terms to this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This application has barely changed since it was submitted last time. It is most certainly NOT in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important and oldest Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, removing most of the natural light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's "Cathedral" synagogue, particularly along its sensitive southern exposure. Kings, Queens, Lords, Sirs and many other distinguished Londoners from Oliver Cromwell to our current King and other humble individuls like me have visited this fabulous building, bathed in its natural light whilst praying, and this will no longer be possible. I urge you to refuse this application in the strongest terms.	NO	Public Access website	10-May-24
24/00021/FULEIA	Shakhani	Ronit	Every peice of heritage in this country seems to be under threat. This is a british cointry with British historic buildings. This Synagogue is no different. It it graded for that exact reason. Stop wasting money on buildings we only need for illegal immigration, stop thr immigration, teach children in school the importance of relationships thereby reducing divorces and then the "housing" problem goes away. The building should be celebrated. Many tourists come here. Embrace the heritage and do not denigrate it. It is for these reasons I object to planning permission being granted.	NO	Public Access website	10-May-24
24/00021/FULEIA	Elias	Aviva	This is an important historical building which should NEVER be demolished. On the contrary, it should be protected. Would you demolish Westminster Abbey to building apartments?	NO	Public Access website	10-May-24
24/00021/FULEIA	Rich	Miriam	I am absolutely opposed to this monstrous tower being erected so close to the synagogue. Irrespective of the benefits of the use and design of the tower itself, it would PERMANENTLY overshadow this absolute gem which is Bevis Marks synagogue. This would have a devastating impact on the synagogue itself, harming the setting and atmosphere that is integral to the ongoing operation of the synagogue, not to mention the blocking of light which would create an insurmountable obstacle to conducting services in the synagogue. No-one with a conscious should allow this tower to be built.	NO	Public Access website	10-May-24
24/00021/FULEIA	Curry	Nicholas	It is hypocritical to allow this project to even be considered within the bounds of the newly created Conservation Area around the Bevis Marks Synagogue. We don't need any more ugly, grey and glass out-of-proportion skyscrapers and should cherish the heritage buildings be they medieval, classical or Victorian that we already have.	NO	Public Access website	10-May-24
24/00021/FULEIA	Stern	Adrian	It is perhaps inelegant to talk about this as a philistine proposal but the damage to the synagogue will be enormous and devastating. After 300 years it needs to be cherished and viewed by all passers by as a noble building serving a community. the monstrous erection you are proposing would put it in shadow spoiling the public's appreciation of this gem for ever. And you know full well it will never stand for over 300 years - who would want it to? Let mammon be celebrated elsewhere - or not at all	NO	Public Access website	10-May-24
24/00021/FULEIA	Green	Edwin	The proposed new building will block the natural light that is available to the Bevis Marks Synagogue. It will be out of place towering over the cherished Synagogue which has a long history. It will NOT add to the environment.	NO	Public Access website	10-May-24
24/00021/FULEIA	Kay	Michelle	I would like to object to the proposed planning application of a 45-storey tower (the current building is 5 storeys) at 31 Bury Street, adjacent to Bevis Marks Synagogue. Bevis Marks Synagogue is Europe's oldest continuously used Synagogue. The proposed building will devastate the Synagogue, and change the landscape forever. Please reconsider this decision and turn it down in consideration of tradition and British culture.	NO	Public Access website	10-May-24
24/00021/FULEIA	Cummins	Mark	We must protect the city's heritage. The proposed tower is far too dominating. Beavis Marks synagogue has rights that must be protected	NO	Public Access website	10-May-24
24/00021/FULEIA	Canfield	Teresa	Please deny permission for this development which will adversly affect Bevis Marks synagogue, a Grade 1 Listed Building of remarkable aesthetic and historical value. Two previous applications for very tall buildings in close proximity to Bevis Marks have been refused. It is a pity that this is even proposed, as it would have effects similar to those projects already denied. This development would also permit demolition of a notable 20th Century building.	NO	Public Access website	10-May-24
24/00021/FULEIA	Welsh	Stephen	As a City of London Guide this development will swamp the synagogue and it is in a conservation zone	NO	Public Access website	10-May-24
24/00021/FULEIA	Bridge	Jenepher	I object to this huge, totally inappropriate scheme that will harm the character of the neighbourhood and especially the historic synagogue and its courtyard - where people can still currently come together and mingle under open sky. Permission to go ahead should be unthinkable after the recent decision to create a conservation area around the synagogue.	NO	Public Access website	10-May-24
24/00021/FULEIA	Braham	Samuel	Please do not allow this! Bevis Marks, the beautiful historic synagogue, has managed to remain unchanged since the 17th century due to its ability to have natural light enter through the windows, which would be obstructed with a large structure surrounding it. This would never be permitted next to St Paul's Cathedral so why should a synagogue not receive the same protection? It's not as if the City is short of available office space.	NO	Public Access website	10-May-24
24/00021/FULEIA	Cummins	Mark	We must protect the city's heritage. The proposed tower is far too dominating. Bevis Marks synagogue has rights that must be protected	NO	Public Access website	10-May-24

24/00021/FULEIA	Smith	Fiona	This development will cause irreparable harm to Bevis Marks Synagogue, and disproportionately affect the Jewish community in London and across the country. In what is becoming a contested and overdeveloped part of London, with such rich history, there must be a pause and appreciation of treasures such as the Synagogue, that will suffer from relentless building works, especially given the shul will loose its natural light should this go ahead. I'm disappointed this shul finds itself under threat once again, indeed, the very community is under threat. Objecting most strongly.	NO	Public Access website	10-May-24
24/00021/FULEIA	Martins Dos Santos	Jonatan Ismael	The synagogue was built in 1701. Twelve years later The Bill of Rights was made official in the country, marking a new departure for our Western values of freedom and democracy. Eighty-eight years later the American Constitution was established, which is still known for advocating for religious freedom. More recently, the International Human Rights and European Human Rights were mainly based on these laws. When this synagogue was built, Jews were openly executed in Spain and Portugal. Even if they were Catholic converts, but they kept any single of the practices of their ancestors, it meant they would be eligible for execution. It wasn't until 1976, approximately, that many of the descendants of those Jews, in Portugal, decided to embrace the faith of their ancestors publicly. While in London, more than three hundred years ago, they could build synagogues and enjoy a free life. Even today, our mayor, Sadiq Khan, has installed over thirty thousand lights for Ramadan in Central London, while in so many countries, religious freedom is far from being a reality. The most interesting thing is that we are in an era of inclusivity, fluidity, and diversity of any kind. Yet, a synagogue that was built one hundred and eighty years before Tower Bridge, and one hundred and fifty years approximately before Big Ben, seems to be less important than those two emblematic buildings. I wonder if our Western values of freedom and democracy matter, as so many people coming from authoritarian countries, where they can be executed for anything that deviates from the official values, find this to be a sanctuary. But it is nothing new, as it was already happening in 1701 when this synagogue was built. So, if the mayor spends money on lavishly celebrating Islam, why aren't we allowed to keep a historical building? Older than Tower Bridge and Big Ben? If a symbol of the city and the values of the West receives such poor treatment, I wonder what is coming next.	NO	Public Access website	10-May-24
24/00021/FULEIA	Bollins	Patricia	This is an ancient synagogue. Part of London's history. Do NOT build near it. Aren't there enough high rise office buildings in the City? Most of them are half empty as post pandemic, people and companies find it easier, cheaper, better for the environment, for people to work from home. Do NOT ruin this wonderful building, or the light it needs. Please. Thank you.	NO	Public Access website	10-May-24
24/00021/FULEIA	Gurevitz	Shirley	I agree with all other objectors. 3 floors less does not make any difference. Bevis Marks needs to be seen in all its glory at all times. Please reject this as happened last time.	NO	Public Access website	10-May-24
24/00021/FULEIA	Gregor	Neil	To whom it may concern, I should like to voice my concern at the indifference shown to the cultural and religious heritage of a key minority group in London embodied in this proposal, the impact of which on the adjacent synagogue - the historical and contemporary significance of which is, or should be, well-understood - is unacceptable. As the saying goes: is nothing sacred? To disregard the meaning of such buildings for the community concerned - in this case the Jewish community, but we might equally be dealing with the heritage of other faith traditions - is to show a contempt for the community itself that brings shames on the idea of 'development'. I urge you to put an end to this act of historical, cultural and communal vandalism, and to encourage the developers to exhibit a mininum degree of historical, religious and cultural sensitivity.	NO	Public Access website	10-May-24
24/00021/FULEIA	Zenios	Jonathan	I was married over 25 years ago at Bevis Marks - the oldest active synagogue in the UK and of critical importance to the Jewish community being built soon after the readmission of Jews after centuries. The proposed development is totally insensitive to the effect on Bevis Marks and denigrates its importance as a historical and cultural landmark that is still going strong.	NO	Public Access website	10-May-24
24/00021/FULEIA	musgrove	theresa	This proposal will have a demonstrably damaging impact on the character of the area, but specifically in regard to the Bevis Marks Synagogue, which is not only of immense national historic and cultural significance but of global significance too. There is absolutely no need to build yet another tower block in this area, but every reason to preserve the unique environment surrounding the oldest surviving synagogue in the UK, especially when so many other later examples have been lost. Sensitivity and consideration of the impact of this development on Bevis Marks must be given the highest priority and this thoughtless plan rejected. Listed buildings do not exist in a vacuum: in this unique case the context of surrounding buildings is vitally important and requires protection from the profit driven development plans currently under consideration.	NO	Public Access website	10-May-24
24/00021/FULEIA	Pitcher	John	The City Corporation should not consent to the destruction, at least aesthetically one of the remaining parts of historic London. St Pauls is protected and I cannot see why this protection should not equally be applied to Bevis Marks.	NO	Public Access website	10-May-24
24/00021/FULEIA	Blackman	Bob	I object to this overdevelopment of the site which will dwarf Bevis Marks Synagogue. This will devastate Europe's oldest continuously used Synagogue.	NO	Public Access website	10-May-24
24/00021/FULEIA	Edwards	Kerry	It has been there for so.long why now do you want to knock it down. Not only does it service the community it is a tourist attraction. Both Jewish people and nonJew	NO	Public Access website	10-May-24
24/00021/FULEIA	Todd	Edward	Bevis Marks Synagogue is a haven amidst the busyness of the City of London & a key part of London's spiritual & historical fabric. To steal its sunlight & hem it in with yet more tall buildings would be a loss to all Londoners	NO	Public Access website	10-May-24
24/00021/FULEIA	Cohen	JK	It is a sad indictment that the Council are even considering allowing yet another high rise development to be built in this small footprint area near this historic and extremely valued amenity, precious as the oldest remaining and working Sephardic Synagogue in London. So many other historic sites in this area have been crowded out by ugly industrial type tall buildings, causing wind tunnels, lack of light and eyesores for no significant benefit or added value. St Paul's Cathedral has been crowded out and can be barely appreciated nor can the Bank of England.it is just wrong and reminiscent of the decimation of history in the Docklands and loss of of our heritage and continued erection of ugly tall buildings blighting our cities.	NO	Public Access website	10-May-24
24/00021/FULEIA	Charig	Nigel	I do not think Nevis Marks should be cast into shadow	NO	Public Access	10-May-24
24/00021/FULEIA	Parker	Marsha	Since the pandemic a great many businesses use home workers, people buy online. The city of London therefore does not require and new developments of office and retail space . In this particular case the proposed plans compromise a special heritage site. Bad planning decisions that destroy our heritage and history can not be recovered. I know this synagogue well, it has been compromised since my visits started 50 years ago, I would like planners to respect our British Heritage. The new plans are hardly an improvement	NO	Public Access website	10-May-24

24/00021/FULEIA	Dalton	Karen	I object to the building because: The proposed development site is within the Creechurch Conservation Area. Planning policy is not to allow tall buildings to be built in Conservation Areas, so this is a direct conflict with the regulations. It will also change the reason conservation areas are designated, and destroy the area uniqueness. The development will also greatly effect the synagogue which is the oldest continously used in England. It has a great history and is visited by people from across the world in addition to the community. Its heritage is on par with St Paul's and other religious buildings and I cannot believe you would allow this type development next to them. The development will overshadow the synagogue building greatly effecting it, and the ability to use the outside space. It will reduce further the natural sunlight in the prayer hall, where people pray.	NO	Public Access website	10-May-24
24/00021/FULEIA	Chambers	Mark	It will disrupt the synagogue services	NO	Public Access	10-May-24
24/00021/FULEIA	Field	Frances	The synagogue is a world renowned building and thriving community and a popular tourist attraction. Any building that has a detrimental effect upon it should be banned. In 2020 a similar planning application was quite rightly refused. This application does not address the fears of those who objected then. A slight reduction in height is a laughable gesture.	NO	Public Access website	10-May-24
24/00021/FULEIA	Rackovsky	Ariel	Please do not shroud this building in darkness, which has been such a source of light for four centuries. Britain shuold be celebrating and preserving the Bevis Marks Synagogue, not trying to hide it and destroy it. Sincerely, Rabbi Ariel Rackovsky Dallas, Texas	NO	Public Access website	10-May-24
24/00021/FULEIA	Flory	Oliver	This disgraceful proposal, undermining the only non-Christian place of worship in the City, must be re-thought and abandoned.	NO	Public Access website	10-May-24
24/00021/FULEIA	Berno	G	It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked.	NO	Public Access website	11-May-24
24/00021/FULEIA	Daniels	Jon	You must not plunge this building into darkness. The building should be celebrated. Many tourists come here. Embrace the heritage and do not denigrate it. It is for these reasons I object to planning permission being granted.	NO	Public Access website	11-May-24
24/00021/FULEIA	de Jong	Benjamin	I'd like to highlight the impact that the proposed construction will have on the Bevis Marks synagogue. A 45-story tower would completely dominate the synagogue, which holds Grade 1 Listed status due to its immense historical and cultural significance. It seems illogical that such a structure would be permitted adjacent to St Paul's Cathedral, so why isn't the synagogue granted the same protection? The tower would obstruct the southern sky view, a crucial element of the synagogue's ambiance and essential for its religious rituals, including observing the moon's passage and celestial bodies. Although the proposed tower may boast excellent design and sustainability features, its location is simply inappropriate. It would cast a shadow over the synagogue and its courtyard for a significant portion of the day, diminishing the courtyard's usefulness for rituals and festivities. Additionally, it would further reduce the already limited natural daylight entering the synagogue, complicating worship activities. Due to the synagogue's historical nature, adding more electric lighting is not feasible. The development site falls within the Creechurch Conservation Area, where tall buildings are typically not permitted according to current planning policy, creating a direct conflict with the statutory development plan. While the City Corporation is obligated to identify suitable locations for tall buildings, their efforts remain incomplete, with an independent assessment not expected until late 2025. The developers argue that the proposed tower provides numerous planning benefits outweighing harm to the synagogue, but these claims lack substance. Proposed restoration of Listed Holland House is commendable, but assertions about the community value of its uses should be viewed skeptically. The existing building at 31 Bury Street, only 40 years old, can be refurbished to continue serving effectively, avoiding unnecessary demolition and energy waste. Furthermore, the proposed tower	NO	Public Access website	11-May-24
24/00021/FULEIA	Bailey	Jane	I strongly object to the proposal to build a skyscraper which would dominate and overshadow the wonderful Bevis Marks Synagogue and many other buildings of historic importance.	NO	Public Access website	11-May-24
24/00021/FULEIA	Short	Geoff	Bevis Marks is a truly historic synagogue, not least because of its association with the Disraeli family. The City of London should be doing everything possible to highlight its significance. Building a skyscraper right next to it does the complete opposite.	NO	Public Access website	11-May-24
24/00021/FULEIA	Graham	Jody	I'm strongly oppose this application I have been to Bevis Marks synagogue many times. It is shocking another very tall building is being considered. This was refused two years ago, Bevis Marks a grade 1 listed building is now in Creechurch Conservation and is the one of the most important Jewish sites. The new building would dominate the skyline blocking out light and completely overshadowing the synagogue. Please rethink this application. Take into consideration the amount of tourism and visitors to an iconic place of worship. Thank you	NO	Public Access website	11-May-24

24/00021/FULEIA	Webster	Martin	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a Londoner and a visitor to Bevis Marks Synagogue and am dismayed to see this new proposal, particularly after a similar application was refused two years ago, and also in the light of the recent adoption of the Creechurch Conservation Area. This new application is only very slightly changed from the last submission and therefore should also be refused. It is not in keeping with the conservation of a Grade-1 listed building, now also part of a conservation area. It is the most important Jewish site in the UK and the Heritage and Education Visitor Centre is due to open later this year. Its special history, reminding us of the readmission of the Jewish people to England, should be carefully preserved and not compromised by new developments. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this overwhelmingly inappropriate development send about the City of London and its values and attitude towards the Jewish community's unique heritage to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's flagship synagogue, particularly along its sensitive southern exposure. Additionally the proposed re-construction of Holland House would eliminate much of the special character of a unique London building which is the only London example of the work of eminent Dutch architect H P Berlage and would destroy its special interior features. The City of London's desire to have more and more towers seems a strange way	NO	Public Access website	11-May-24
24/00021/FULEIA	Jessop	Manuella	another suggestion of a building that will totally overshadow the only Synagogue in Europe to have been in continuous use for over 300 years. Such a building would completely overwhelm this historic building - such a thing would never be allowed to Westminster Abbey or St Pauls Cathedral - why is this being allowed for a Jewish building? There is already very limited natural light into this beautiful building - adding a 45 storey monstrosity (against all the rules of a conservation area such as Creechurch) would only block out what is remaining. I am utterly appalled that you continue to consider applications that encroach on the Grade 1 listed Bevis Marks synagogue, particularly as there is no perceptible difference between this new application and the previous (rightly) rejected applications. Bevis Marks is the most historically significant place of worship for the Jewish Community in England, and allowing such overbearing, intrusive development around the Synagogue is patently ridiculous. This would be immediately refused around St Pauls Cathedral or Westminster Abbey, and begs the question of why the needs of the Jewish community who regularly worship at Bevis Marks are being ignored.	NO	Public Access website	11-May-24
24/00021/FULEIA	Roberts	Daniel	To Anna Tastsoglou and the City of London Corporation, I write in concern at the effect this potential tower development could have on the oldest continuously used synagogue in Britain, namely the Bevis Marks Synagogue, dating from 1701. This is akin to what Westminster Cathedral represents for British Roman Catholics for example. As I am aware, the development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. For the Jewish faith, marking the position of celestial bodies is paramount, with a setting sun marking the beginning and ending of the seventh day for example. The synagogue has been designed to make use of the southern sky view, and the aforementioned development would obstruct this. The cultural significance of the continued safe existence of such an important synagogue in Britain cannot be avoided. Judaism, while being at the root of many ancient religions, has endured persecutions over centuries for the transnationality of its beliefs and its adherents, and its tolerance of other beliefs, with this synagogue being one of few to have endured. To sacrifice such cultural institutions to the short term interests of Mammon would represent a moral collapse on behalf of a public body, and would not be in the interests of a City of London corporation that understands the stabilising effect and long term vision coming from such cultural institutions. I therefore urge you to reconsider such a development seeking maximisation of land value in close proximity to a long standing and important cultural institution. Yours Sincerely, Daniel Roberts	NO	Public Access website	11-May-24
24/00021/FULEIA	Kirk	Helen	Bevis Marks is a most wonderful place. We have visited and been shown round and can understand the dire consequences were this enormous plan of works to be put in place. Bevis Marks is in such a serene courtyard with sunshine glowing into it, and it deserves to be retained with those benefits to its proper use and as a synagogue. Tall buildings cause real problems and these proposals should not be granted permission. Bevis Marks being in the new Conservation Area gives much greater reason to protect the setting of this famous calm and tranquil place and space. Do not let this monstrous proposed development overtake such beauty and quietude. Respect this ancient building and let it keep its current respectful neighbours and its sunlight. Keep out this monstrous development. It has no place alongside Bevis Marks. Why? Because the setting of this very important religious building is so significant and the setting and its attributes deserve protection from loss through such gross cramming of new high-rise and despoilation of the current status within the Conservation Area. Please count this as a vey strong objection to really unsuitable development proposals. Please inform the officer and the Council meeting of this strong objection to these proposals.	NO	Public Access website	11-May-24
24/00021/FULEIA	Olesker	David	When I lived in East End I was privileged to worship at Bevis Marks. This unique and historic building would be overwhelmed by the erection of a 45 storey building virtually on it's doorstep. This is only one step away from "preserving" the UK's oldest synagogue by burying it underground! The plan would not only diminish the benefit of the synagogue to the public but also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole.	NO	Public Access website	11-May-24

24/00021/FULEIA	Weiner	Julia	I am truly shocked by the proposal to build a 45 storey tower would completely overwhelm the oldest and most precious Jewish synagogue in the country. This is not only a Grade 1 Listed building of enormous historic and cultural significance but also a building that is used for services. I may not be Sephardi but still have had the privilege of attending services there which are quite an experience. I seem to remember that when there was talk of developing Paternoster Square near St Paul's Cathedral, the King as he is now stepped in and plans were changed. I hope this will be the case. Having been to Bevis Marks, I know the courtyard is an important meeting place and we need to see the sky for religious reasons. The tower would also reduce the amount of daylight entering a building lit frequently by candles so making it very difficult to see. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. Furthermore, as the building it will replace still has plenty of life in it, demolishing it and starting afresh is a waste of resources.	NO	Public Access website	11-May-24
24/00021/FULEIA	Stone	Marion	Please reconsider your objectionable plans to build a multi storey building on the site of Bury House. The potential detrimental damage to the historic, PRESERVED building of the Bevis Marks Synagogue must be considered. It is a valuable asset to the city of London and its natural surroundings must be remain unspoiled. Thank you	NO	Public Access website	12-May-24
24/00021/FULEIA	Firestone	Noreen	Bevis Mark synagogue is a national treasure. It must not be obscured by a building which will block the natural light. Visitor from all over the world put Bevis Marks top of their list to visit. Please block the plan.	NO	Public Access website	12-May-24
24/00021/FULEIA	Hawk	White	This synagogue is a historic building and relays in natural light. I should remain without any light obstructions to preserve its history and the Jewish heritage in this country.	NO	Public Access website	12-May-24
24/00021/FULEIA	Newman	Jeremy	I find it astonishing that this application is eveb being considered. It would completely overwhelm the adjacent synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance - and not only to the Jewish community, who are under so much pressure at this time. The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building.	NO	Public Access website	12-May-24
24/00021/FULEIA	Cramer BEM	Dalia	Hi I can't believe that this application is even being considered as it will definitely overwhelm this most beautiful synagogue and massively reduce the amount of light that the synagogue and its courtyard need to allow it to be used for important ceremonies and rituals intrinsic to the Jewish faith Please reconsider Ty Dalia Cramer BEM	NO	Public Access website	12-May-24
24/00021/FULEIA	Silver	Justin	I strongly object to this application because the proposed building would impact Bevis Marks Synagogue which relies on natural light for it's spiritual ambiance. Bevis Marks is one of the oldest Synagogues in Europe and is more important communally, spiritually and historically than another new building blotting out the sky from those under it	NO	Public Access website	12-May-24
24/00021/FULEIA	Lewinsohn	Ronald	Historic buildings needs natural light and space and not been hemmed in between skyscrapers. The building is a tourist attraction and important due to age and historical importance With all the work would result in damage to this historic building	NO	Public Access website	12-May-24
24/00021/FULEIA	Phillips	Adrienne	I think an office block of 40 or more storeys in this position is inappropriate so close to a grade 1 listed and historic building. Does London really need another sky scraper and if so maybe it should be situated elsewhere.	NO	Public Access website	12-May-24
24/00021/FULEIA	Musson	Jeremy	I'm writing to express the strongest opposition to this new application (24/00021/FULEIA). I was the co-author of the recent Bevis Marks Synagogue Conservation Plan which helped highlight the extraordinary international signficance of this place, and its importance in London heritage terms. I am shocked and saddened to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. The importance of this building was highlighted in Simon Schama's The Story of the Jews, and justly celebrated by many architectural experts for the quality of its survival. A neighbouring synagogue formerly on Duke's Place was destroyed by bombing. This new application, hardly different since the last time it was submitted and refused, does considerable harm to the heritage value of a Grade-1 listed building, which is now also in a conservation area. Bevis Marks is arguably the most important Jewish site in the UK, as the oldest working synagogue in the country, and its particualt atmosphere and light is a key part of that signficance. The proposed new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the southern sky-view, and overshadow the synagogue and its courtyard, drastically reducing its remaining light. This just should not be permitted just metres from British Jewry's Cathedral synagogue. I urge you to refuse this application.	NO	Public Access website	12-May-24
24/00021/FULEIA	Joseph	Michael	This is a unique and historic place of worship. It reflects positively on the Cityand on tolerance and understanding between faiths,beliefs and different cultures. It is a haven of spiritual values..above money,. It should be respected and allowed to breathe!	NO	Public Access website	12-May-24
24/00021/FULEIA	Tilley	Joe	I am not opposed to redevelopment of the site per se, but I don't think the current plan is very sympathetic to the new conservation area around Aldgate. This is a very tall building, and its presence has the potential to disrupt the views of the Gherkin, which I think is a really excellent example of modern architecture and should be celebrated and protected. At the other end of the spectrum is the historic Bevis Marks synagogue. I understand that, as a building which does not use electric lighting, the proposed tower will severely impact on the amount of light which flows into the building. Whilst I am sure that all faith communities value their building, this one has particular significance as the oldest in the UK and one of the longest used in Europe. It would be a shame if the new building caused the synagogue to become unused. I worry that, coupled with the proposal to demolish part of Liverpool St station and replace that with a modern tower, this part of the City is going to lose its character. Given that we do not have the wide streets and blocks of somewhere like New York, surely it's also pleasanter for people in the existing skyscrapers not to have another building immediately opposite?	NO	Public Access website	12-May-24
24/00021/FULEIA	Sogbodjor	Harriet	This historic synagogue is an important part of London's history and must NOT be demolished. There are other places where new homes can be built without such careless destruction.	NO	Public Access website	12-May-24
24/00021/FULEIA	Treatman	Aharona	This is a historically important building not just for London, but for people all over the world. It is an important tourist destination and part of the heritage of Sephardic Jewry.	NO	Public Access website	12-May-24
24/00021/FULEIA	Ambrose	Jonathan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	12-May-24

24/00021/FULEIA	Maynard	Esther	The impact the development will have on the Bevis Marks synagogue will be disruptive to the faith community. With it being one of the oldest faith institutions in the ward it would be a travesty if this development would result in it losing its central character.	NO	Public Access website	12-May-24
24/00021/FULEIA	Ambrose	Jonathan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	12-May-24
24/00021/FULEIA	Roberts	Maralyn	I object to this proposal. Bevis Marks is an extraordinary building with a glorious heritage. This proposal will rob Bevis Marks of natural light as well as towering over this precious piece of the City of London's important heritage. Do not allow this scheme to stand.	NO	Public Access website	12-May-24
24/00021/FULEIA	Lovat	Laurence	Bevis Marks is an iconic landmark in the City of London. It is known throughout the whole Jewish world as it and exceptional historic place of worship. It should not be completely overshadowed by a massive building which will take away from this unique piece of Jewish London heritage.	NO	Public Access website	12-May-24
24/00021/FULEIA	Boonin	Dov	Beis Marks Synagogue is foundational to British Jewish history and British history. This planning application would further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible	NO	Public Access website	12-May-24
24/00021/FULEIA	Wimborne	Zoe	This planning proposal is substantially to the detriment of Bevis Marks synagogue and would remove majority of natural light within its building and overwhelm part of London's cultural heritage. My grandmother grew up in the east end of london and would talk about how important Bevis Marks was when she was growing up, how old it was and how important it was to the local cultural heritage. Allowing this planning permission to go ahead of such a tall building would have such a negative impact when London should be preserving what little is left of such buildings. City of London does not need yet another tall skyscraper and why does it need to be there, impacting an historic religious building and place of worship. The benefits do not come close to outweighing the disadvantages and negative impact it would bring.	NO	Public Access website	12-May-24
24/00021/FULEIA	Altman	Colin	This is essentially a very similar proposal to the one that was submitted in 2020 and should be rejected for the same reason. This huge tower would totally overshadow and obstruct the view of the Grade 1 listed Bevis Marks synagogue, continually in use since its construction in 1700. hemming it in on the only side where it still has access to the light and where the courtyard can still be used for important religious ceremonies requiring access to a view of the sky. Preserving listed buildings such as this also means protecting their context, not simply preventing the demolition of their fabric and making them impossible to be seen and used as they should. Furthermore, the Corporation is required to identify location suitable for tall buildings - not only has this work not yet been completed to allow such a development in the context of an integrated plan for the area, but the site is within the Creechurch conservation area, which specifically excludes such tall constructions. The existing building at 31 Bury Street is only about 40 years old and perfectly capable of renovation and use for many years to come. Complete demolition and replacement is not only unnecessary but produces huge amounts of carbon emissions which completely outweigh the "benefits" disingenuously listed by the applicant, such as being car-free (which the existing building could also be) and exhibiting "holistic environmental design". This application is a well-known developer technique of re-submitting a previously-rejected application with superficial changes in order to pressure the responsible authority into granting totally unmerited approval. It should be rejected.	NO	Public Access website	12-May-24
24/00021/FULEIA	Wurtzel	David	A building of this height and dimension would block the light from Bevis Marks Synagogue and seriously impact on their ability to continue to hold services. Quite apart from its listed status and the fact that this is a conservation area, Bevis Marks is the oldest working synagogue in England the last surviving synagogue in the part of London where Jews first settled in the 17th century. Its significance to the City is obvious. The proposal would also adversely impact on Holland House, another fine listed building. Altogether the proposed building would simply shove something into what someone thinks is an available space regardless of its actual location and its impact on its neighbours. The cynicism of this stands out and says 'any new building can go anywhere regardless'	NO	Public Access website	12-May-24
24/00021/FULEIA	Howe	Anthony	The proposed development, which had already been turned down, is totally unsympathetic to this incredibly important and historic building. Bevis Marks synagogue is significant not only to the City of London but of international importance, and this fact should be respected by any future development that might be proposed. What is planned would cause enormous harm - which can not be justified - and moreover compromise security at a time when many in the Jewish community are feeling the effects of the rise of anti-Semitic activities. The Corporation of London has a responsibility to protect one of the City's hidden jewels and to the community that cherishes it.	NO	Public Access website	12-May-24
24/00021/FULEIA	Stone	Jeremy	I write to object in the strongest possible terms to this brutal and unnecessary development. As many have said, a building on this site and of such dominating height would blot out most natural daylight from the historic synagogue at Bevis Marks, which has the distinction of being the oldest synagogue in Europe still in regular use. I would urge the Corporation to remember that when it previously rejected this development application, the reason was conservation. The location subsequently gained the protection of being included in a conservation area. The Corporation then decided that the relevant protections would no longer include restrictions on height. This is not a good look. It is also not a good moment, historically, for the Corporation to withdraw its protection from the only specifically Jewish religious building in the Square Mile. These are times when the heritage of toleration in this country, and the City most particularly, needs to be reaffirmed, not buried under 48 stories of concrete.	NO	Public Access website	12-May-24
24/00021/FULEIA	Mcclements	Neil	The proposed development is totally out of scale to the district and will greatly diminish and overshadow the Bevis Marks synagogue. The synagogue is unique in the City and worshippers are entitled to unimpeded skylight which the proposed development will greatly and negatively diminish. The congregation are deeply concerned at this,proposal as am I.	NO	Public Access website	12-May-24

24/00021/FULEIA	Gold	Jonathan	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I am a visitor to Bevis Marks Synagogue and am dismayed to see this new proposal, particularly after a similar application was refused two years ago, and also in the light of the recent adoption of the Creechurch Conservation Area. This new application is only very slightly changed from the last submission and therefore should also be refused. It is not in keeping with the conservation of a Grade-1 listed building, now also part of a conservation area. It is the most important Jewish site in the UK and the Heritage and Education Visitor Centre is due to open later this year. Its special history, reminding us of the readmission of the Jewish people to England, must be carefully preserved and not compromised by new developments. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this overwhelmingly inappropriate development send about the City of London and its values and attitude towards the Jewish community's unique heritage to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's flagship synagogue, particularly along its sensitive southern exposure. I strongly urge you to refuse this application.	NO	Public Access website	12-May-24
24/00021/FULEIA	Gottschalk	Sylvia	The proposed building will completely block the light in the synagogue. It will force us to worship in semi-darkness, and even the patio will be overshadowed by this building. As a worshiper of Bevis Marks it would affect me deeply to be forced to pray without any natural light. The proposed building is visually horrendous and no amount of amenities can make up for the harm it would cause synagogue and its congregation.	NO	Public Access website	12-May-24
24/00021/FULEIA	Rodrigues Balbuena	Monique	This is the only synagogue in Europe that has held regular services continuously for over 300 years. It is incredibly valuable as a historical building and as place that holds spiritual and emotional significance for its living religious community in London and its friends all over the world. The building should be protected, not thrown into darkness.	NO	Public Access website	13-May-24
24/00021/FULEIA	Jebreel	Elliot	I am disappointed that this planning application is even being considered when it will overshadow and endanger the most historically significant Synagogue in the UK - which is rightly reflected in its Grade 1 listed status. This application would not have been considered if it was on the doorstep of St Paul's Cathedral. I am a regular at said Synagogue and am a JP sitting on the central bench, bringing me into the city on a regular basis. The proposed building would literally overshadow the synagogue and reduce the already limited sunlight it receives. I am also shocked that it is being considered when it is clearly in conflict with the Creechurch Conservation Area and the statutory duty to not build tall buildings in such an area. All in all whilst the building itself may be designed in an impressive fashion this is clearly the wrong location for it and quite frankly must be rejected.	NO	Public Access website	13-May-24
24/00021/FULEIA	Roberts	Guy	I'm writing to express my strong opposition to this new application (24/00021. I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Sayliss	Adrian C		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Gibbons	Stuart		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Dreyfuss	John	Please see document tab for comments dated 01.05.2024.	N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Isaacs	Tina	I am writing to object to the approved 45 storey tower that will overshadow historic Bevis Marks Synagoge. It would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. Many of us use the Bevis Marks archives to study family history and this development would taint that experience. I cannot understand why planners would allow this development -- if it were St Paul's you wouldn't. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The proposed building would overshadow the synagogue and its courtyard for much of the day. It would also further reduce the already minimal daylight that penetrates into the synagogue, Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. The proposed building would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. Tina Isaacs, London resident	NO	Public Access website	13-May-24
24/00021/FULEIA	Eskenzi	Eileen		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Haagman	Francine	HI, I object to this proposal. It will have a a very negative impact on Bevis Marks site.	NO	Public Access	13-May-24
24/00021/FULEIA	Blake	Michael	Bevis Marks Synagogue is the oldest synagogue in use in Britain and dates back to 1701. A 48 storey office building was proposed in 2020 following a campaign and the Corporation refused permission in 2022. I understand that the area is designated as a Conservation Area and whilst I appreciate that the Corporation is proposing to scrap the ban on tall buildings surely they must make an exception in this particular case. The synagogue's southern sky view should remain unobstructed and the proposed development would overshadow the synagogue and its courtyard. It would also reduce the already minimul daylight that would severly impact on the Synagogue and increasing artifical light is not really an option. I beg you to decline permission for the project.	NO	Public Access website	13-May-24

24/00021/FULEIA	Milne-Day	Mary	Bevis Marks Synagogue is one of the most important buildings in London and I was delighted when it was included in a Conservation area earlier this year. If this application were to be granted it would make a mockery of the Conservation area and would adversely impact on the setting and secluded nature of the synagogue. The scale of the proposed building would also impact adversely on the other listed buildings within the conservation area. For these reasons I vociferously object to this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Preston	Jane	Dear Sir/ Madam I am dismayed at this example of overdevelopment.Bevis Marks Synagogue is part of the East End's cultural & religious history and should be protected. Yours faithfully Jane Preston	NO	Public Access website	13-May-24
24/00021/FULEIA	Newman	Martin		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Simon	Michael	I object to the re-submitted application. As has been stated by other objectors the proposed 42 storey tower would dominate and overshadow the synagogue depriving it of light and ability to conduct its established religious practices, since its foundation in 1701. Not only does the building have Grade 1 listed status, but it is of enormous significance to the wider British Jewish Community. The founders of this synagogue and the families who still worship at Bevis Marks go back to the Resettlement of 1656. Without question, this synagogue has the most important religious, cultural, heritage, and historical significance above all other places of Jewish worship for Jews in London. The Spanish and Portuguese [S&P] Jewish community would be irretrievably harmed by this proposal. The proposal would overshadow the synagogue and its courtyard to its permanent detriment. In terms of the alleged amenity aspects cited in the proposed application these are quite simply put disingenuous. The so-called benefits are not justified in the context of the harm caused and quite frankly ludicrous. The incredible importance of the heritage aspect of the building for both the S&P Community locally and the wider Jewish community nationally is unrivalled. Regardless of the recent change in City planning by-laws this building must be treated as an exception and protected from the damage caused by the proposal.	NO	Public Access website	13-May-24
24/00021/FULEIA	Amado	Can	The proposed new building will intrude on the Bevis Marks synagogue and its small outside space. This should not be permitted, to preserve the historic nature of these premises. Would such a proposal be even considered next to St Pauls Cathedral? Are more office towers really needed in the City when people are working 2-3 days from the office and the rest from home? City corporation should be more thoughtful in the new reality and allow smart developments instead of another monstrous office block.	NO	Public Access website	13-May-24
24/00021/FULEIA	Mann	John		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Filer	Paul	I wish to object to this highly inappropriate development. It is too high and has too great an in impact on important neighbouring buildings, particularly the historic Bevis Marks Synagogue, to be allowed to proceed.	NO	Public Access website	13-May-24
24/00021/FULEIA	BenTzvi	B	This will damage the legacy of Bevis Marks Synagogue nearby and it will irreparable destroy the ambiance and light for this Synagogue Councils should be protecting historical buildings like this not consigning them to historical oblivion Please refuse this planning application	NO	Public Access website	13-May-24
24/00021/FULEIA	Rafaeli	Barbara	The overwhelming numbers of well presented, factual objections against this insensitive, inappropriate building proposal must prevail. As anyone with knowledge of London is aware, Bevis Marks is a Grade 1 Listed Building of great historical value to London and the UK generally and continues as a vibrant heritage to the Jewish Community. It will be an absolute desecration to allow a 42 storey tower, as proposed, to overshadow the synagogue, which has a profound religious and cultural heritage, with important, historic significance. Protecting London's heritage buildings is even more incumbent on Decision Makers in the frenzied onslaught of skyscrapers battering London's historic legacy. Your mission and decision-making is to protect Bevis Marks, like any other valuable religious and heritage building, from this crude, destructive proposal. Your responsibility, as protectors of London's historic legacy, is to REJECT this damaging, insensitive and unacceptable proposal. Thank you, Barbara Rafaeli	NO	Public Access website	13-May-24
24/00021/FULEIA	Dunbar	William	This proposal will overshadow the synagogue, one of the most important in western Europe. This will have a significant negative affect on the historic character of the nighbourhood, as well as cutting out light and ruining views and streetscapes	NO	Public Access website	13-May-24
24/00021/FULEIA	Teeger	Edward		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Agustin	Laura	Too much density in this area, less and less light, difficult to stand back and get views of anything.	NO	Public Access	13-May-24
24/00021/FULEIA	Lazarus	John		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	Drain	John	Yes another attempt to destroy the visual amenity of a listed building.	NO	Public Access	13-May-24
24/00021/FULEIA	Crowne	Ben	As a local resident and member of Bevis Marks Synagogue, I am strongly opposed to this new application (24/00021/FULEIA) and the massively negative impact it would have on the UK's oldest synagogue. The new proposed building would overshadow both the synagogue and the courtyard, permanently impacting its setting and light. It is very disappointing that after plans were rejected in 2022, this application has returned with minimal changes to this aspect of the building. It is even more disappointing that this application has been made with such disregard for the new Conservation Area which was approved only last year, one of whose main purposes was to protect the synagogue from exactly this issue.	NO	Public Access website	13-May-24
24/00021/FULEIA	Lipton	Zachary	I am a devoted member of the Bevis Marks Synagogue community. This project will leave this incredibly important historic building and community in the dark. This building proposal is encroaching on a heritage site and a conservation area and is entirely inappropriate for this space.	NO	Public Access website	13-May-24
24/00021/FULEIA	Castle	Lauren		N/A	Email (attached in DC- received by email file)	13-May-24
24/00021/FULEIA	hajioff	michele	The plan to have a huge tower is wrong and the current building should be left alone. The very high tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of important historic and cultural significance for the Jewish community but also for London in general. We all want our city to progress with its time but not at the detriment of existing historical buildings (and their immediate surroundings) which should be preserved for future generations. Extensive building around this historical place of worship should not be allowed in this case Thank you	NO	Public Access website	13-May-24
24/00021/FULEIA	Wiazel	Michal	The development will distroy a view of a listed building and also overwhelm the synaguogue and its members and guests.	NO	Public Access website	13-May-24

24/00021/FULEIA	Benjamin	Jon	Re application (24/00021/FULEIA): I'd like to express my profound opposition to this application, especially given that an almost identical proposal was rejected just a couple of years ago. The Bevis Marks Synagogue is in the Creechurch Conservation Area, and if this means anything at all, it should be that an overbearing development like this is not allowed. The Synagogue is an immensely important place of worship for the Jewish Community, marking its return to England after being expelled in 1290, having previously lived in the City of London. The Spanish and Portuguese Community came from Amsterdam, where I visited recently, and where the Jewish quarter is protected and valued. It would be to the City of London's shame if the oldest synagogue in continuous use in this country was desecrated in this way. Blotting out the last remaining square of sky visible from the precincts of Bevis Marks, the building itself would be rendered immeasurably more gloomy, given the lack of electric light, as well as making the courtyard overcast, preventing the viewing of the moon and stars which indicated the onset of the Sabbath and Festivals. Bevis Marks is also an important landmark for the wider community in this country, hence its listed status, but it would be hard to imagine such an impactful development being allowed next to St Paul's Cathedral where the surrounding buildings have been purposely limited in height. I hope and trust that, as previously, this application will be refused.	NO	Public Access website	13-May-24
24/00021/FULEIA	Pereira-Mendoza	L	Ambience is so important in all buildings but especially in historic religious buildings. A vault with bright sunshine is wrong. A building without sunshine is wrong. Please do not ruin the ambience of Bevis Marks, a synagogue built numerous years ago and used continuously. Consider neighbours always.	NO	Public Access website	13-May-24
24/00021/FULEIA	Knight	Marie-Anne	I object to this proposal 24/00021/FULEIA going ahead and destroying yet more of the history of this wonderful area. I understand that this proposal was rejected before, and should be rejected again. This is a very important building of historical note (built in 1701) and of incredible importance to the Jewish population. Our historical buildings should be protected at all costs and I am angered at how many of them in the City of London and adjacent East End that are being destroyed when dollar signs are in the eyes. Is Bevis Marks not a Grade 1 listed building? Please see sense and stop this nonsense before it is too late and we lose everything of importance for our future generations.	NO	Public Access website	13-May-24
24/00021/FULEIA	Englender	Daniel	The City of London has a unique history and it's at a cross-roads in terms of how it balances its history alongside 21st Century development (and beyond). The erection of this tower alongside the very special Bevis Marks Synagogue is the wrong move, the wrong location for this tower and only serves to reduce the qualities that City of London shines onto the world. Similar schemes have been rejected previously and this new scheme does not take each of the previously-upheld objections in a positive way.	NO	Public Access website	13-May-24
24/00021/FULEIA	Bogod	Howard	I am dismayed to see that yet a again the owners of the Bury House are seeking permission for an inappropriate development despite having had two substantially applications turned down before. The proposed development would seriously damage the environment and light an the Grade 1 listed Bevis Marks synagogue which was opened in 1701 and used for religious services continuously ever since. This was 9 years before the rebuilt St Pauls cathedral was opened. How would a a similar application in the shadow of St Pauls be viewed by the Corporation and public at large? I for one would object.	NO	Public Access website	13-May-24
24/00021/FULEIA	Robinson	Brian	We am appalled at the repeated applications to diminish the importance of the Bevis Marks Synagogue. Having successfully and sensibly rejected previous plans to build high rise buildings to dwarf and diminish the most important and oldest synagogue in the United synagogue the City of London must oppose the new application. and indeed any further attempts to do so. . I hope this can be accomplished speedily and permanantly. Dr and Mrs Brian and Judith Robinson	NO	Public Access website	13-May-24
24/00021/FULEIA	Hale	Alastair	These proposals would negatively impact the Bevis Marks Synagogue, overshadowing the building and restricting the community as they seek to practice their faith. The city of London must support its faith communities, recognizing the role they have played and will play in making the city what it is. Granting this planning permission in its current form would put the interests of investors ahead of the community.	NO	Public Access website	13-May-24
24/00021/FULEIA	Barker	Neil	I write to express my strong opposition to this application I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.. Please refuse this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Nacamuli	Alec	This development will totally surround the Bevis Marks Synagogue, the oldest continuously used synagogue in the UK, with high-rise buildings. It will obstruct the last remaining opening towards the sky and cast the synagogue in permanent shadow.	NO	Public Access website	13-May-24
24/00021/FULEIA	Goldschmidt	Robert	Although I now live outside the City I was educated and work within it. I have always valued the presence of the Bevis Marks synagogue. There is no other place in the UK which so reflects Anglo Jewry's connection to this country. The planning proposal will hugely blight this and overwhelm it, changing the nature of how the synagogue is used and forever impacting on our relationship with it. Please refuse this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Black	Michael	I am a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after the refusal of a very similar one just two years ago, and the recent adoption of the Creechurch Conservation Area. The new application, barely changed since the last time it was submitted, is not in keeping with the conservation of Bevis Marks Synagogue, a Grade-1 listed building, which is now within the Conservation Area. This seventeenth-century synagogue and its soon to open education center in the precinct, is the most important Jewish site in the United Kingdom and a jewel in the crown of world Jewish heritage and the Sephardi tradition of which I am part. The proposed tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, diminishing its remaining light. By allowing this disproportionate and damaging structure, what message about the City of London and its values would be given to hundreds of thousands of visitors, including school children, from across the World? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern side. I am also concerned by the statements of some of the supporters of this project which seem to dismiss the importance of minority religious practice in this country in favour of iconic architecture. The planning application is completely unacceptable, and I urge you to refuse it.	NO	Public Access website	13-May-24

24/00021/FULEIA	Hughes	Stephen	As a former head of religious buildings survey in Wales and vice-president of ICOMOS-UK I recognise the importance of maintaining a low rise context to one of the most important religious buildings in the UK, the Bevis Marks Synagogue.	NO	Public Access website	13-May-24
24/00021/FULEIA	Jacobson	David	I wish to register my objection to this planning application on the following grounds: 1. The proposed tower of gross dimensions will completely overwhelm a grade one listed building in a conservation area. The said listed building, the Bevis Marks Synagogue, is a historic monument of unique national and international importance that I am objecting. to this monstrous development. 2. It would obliterate the southern sky view, which is an essential part of setting part of the synagogue, a congregational building, which relies on natural light and will impair regular religious services and other gatherings which take place there, especially in winter when natural light is of a premium. 3. The deep excavations for the 4 basement storeys will inevitably threaten the stability of the 325 year old synagogue, which was built with relatively shallow and much less secure foundations. 4. The execution of this huge project and associated excavation and drilling operations will cause untold noise, dust, vibrations over an extended timescale that will inevitably cause untold disturbance to and pollution of the rites, solemnities and ceremonies taking place in the neighbouring historic building. It is as a qualified chartered engineer, architectural and social historian, British citizen, resident of London, and member of the Jewish community that I lodge this objection.	NO	Public Access website	13-May-24
24/00021/FULEIA	Furnell	Alison	This beautiful historic building is a testament to the traditions and long history of Ango Jewry. I am deeply saddened to hear that Bevis Marks Synagogue is once again under threat of being overshadowed by City of London unsympathetic high rise architecture. Yet another symbol of the erasure of Jewish life in England.	NO	Public Access website	13-May-24
24/00021/FULEIA	Herskovits	Georgie	I object	NO	Public Access	13-May-24
24/00021/FULEIA	Davila y Verdin	Juan	I object the construction of new buildings of that size in this historical area of the city of London, due to the fact that compromises the integrity of other buildings in the area, in particular of the synagogue next door.	NO	Public Access website	13-May-24
24/00021/FULEIA	Maleh	Maurice	Bevis Marks is a unique synagogue of major significance to the Jewish Community. It is in regular use and I myself has worshiped there. To chose to build a 43 storey skyscraper for offices next to it leaves me quite shocked and dismayed at what is a serious lack of judgement and understanding by those involved. The application as a whole has no merit and must be rejected at all costs. Thank you.	NO	Public Access website	13-May-24
24/00021/FULEIA	Davis	Rina	Lack of light to the synagogue	NO	Public Access	13-May-24
24/00021/FULEIA	silverbeck-setti	sima	I object to this scheme as will compromise the oldest listed synagogue in London by making it dark.	NO	Public Access	13-May-24
24/00021/FULEIA	Livingstone	Elly	The proposed structure would overwhelm and block out of site the Bevis Marks Synagogue, a Grade 1 Listed building of enormous historic significance. It would destroy the southern sky view and overshadow the synagogue and its courtyard. The proposed development is a monstrosity, the proposed benefits do not stand up to scrutiny.	NO	Public Access website	13-May-24
24/00021/FULEIA	Glickman	Lucy	but its place in our Jewish narrative matters. Synagogues around the world tell the Diaspora story and keep it alive. The proposed planning would block light. The proposal is wholly inappropriate" and an obscenity which would result in "significant reduction in sunlight.	NO	Public Access website	13-May-24
24/00021/FULEIA	helfgott	maurice	Bevis Marks Synagogue is a unique , historic and vital important, British - Global - London cultural, historical and religious landmark. the "St Paul's " of London Jewry it simply should NOT be overshadowed by this enormous building. I have visited Bevis Marks to pray , to grieve , to celebrate , to learn and to mix with people of all faiths and none. please please please do NOT overshadow this extraordinary and special place...	NO	Public Access website	13-May-24
24/00021/FULEIA	Glantz	Nikki	This is an historic religious site and in any other country it would not be a consideration to demolish it and build flats or other on it! I oppose this. My cousin got married here and is one of the oldest synagogues in the UK. PLEASE OPPOSE THIS	NO	Public Access website	13-May-24
24/00021/FULEIA	Preter	Daniel	I object to this project, which will have an enormous negative impact on its surroundings	NO	Public Access	13-May-24
24/00021/FULEIA	El Baz	Freya	We must preserve this stunning building of importance to both our local communities and the City of London. I OBJECT	NO	Public Access website	13-May-24
24/00021/FULEIA	Simmons	Dame Melinda	This proposed development should not be approved. It presents a direct threat to Bevis Marks synagogue, a building in use for community prayer which also represents Jewish history in the UK over centuries. This development is going to block out light in the building rendering it musty and unusable. It is an assault on community and on Jewish as well as British history in the City of London.	NO	Public Access website	13-May-24
24/00021/FULEIA	Bloom	Hannah	Bevis Marks Synagogue has been used for over 300 years and this plan would make it unusable. Please do not do away with this heritage site which is iconic to the British Jewish community. It is an integral part of the City life.	NO	Public Access website	13-May-24
24/00021/FULEIA	Glantz	Jacob	I object	NO	Public Access	13-May-24
24/00021/FULEIA	Shock	Katherine	London, where I was born, and which I dearly love, has already lost so much of its grace and character as huge and disporportionate blocks have arisen to dwarf the precious historical buildings. If it is possible to save one more special place from being spoiled forever by an inappropriate building rising to darken the area and spoil what little is left of our heritage you have my voice objecting to this new application. My illustrations for the book 'That Mighty Heart -Visions of London' were produced as a homage to this special city. Please keep it special.	NO	Public Access website	13-May-24
24/00021/FULEIA	Proner	Barry	This proposal will grossly detract from the magnificent and historic Bevis Marks Synagogue. It is an example of greed over public interest.	NO	Public Access website	13-May-24
24/00021/FULEIA	BERNSTEIN	Shira	The tower proposed on the synagogue's southern horizon would destroy the setting of the synagogue, which is so important to this 300 year old cathedral. The setting is what makes the synagogue a community hub, and the would reduce the synagogue's natural light levels beyond usability.	NO	Public Access website	13-May-24
24/00021/FULEIA	Molvidsson	Kay	This is a historic building and part of the Jewish heritage of the Jewish community in London. It would be so sad to lose this. Please re-consider and take into account the whole Jewish community in london that will be affected and deeply saddened to see this rich part of our culture be no longer available.	NO	Public Access website	13-May-24
24/00021/FULEIA	El baz	Shu	This building has so much importance. I object	NO	Public Access	13-May-24
24/00021/FULEIA	Sixou	Linda	I live outside England but am a regular visitor to London and Bevis Marks Synagogue and I am very sad to see this new proposal. I understand this follows the refusal of a very similar application a couple of years ago which is even more surprising, especially with the recent Creechurch Conservation Area coming into being. The new application is still not in keeping with the protection of a Grade-1 listed building such as Bevis Marks and even more perplexing for me as the synagogue is now in a conservation area. The seventeenth century synagogue and its new education center within, is the most important Jewish historical site in the United Kingdom and emblematic of the Sephardi tradition and my heritage. The proposed tower, to the synagogue's immediate south, would dominate the protected setting of the Synagogue, block out the southern sky-view of religious importance for centuries and overshadow the Synagogue and its courtyard, all but stopping the remaining light. As a teacher of Spanish and Sephardic Culture in France, it amazes me that the City of London could even consider permitting this ugly building. This proposal would never be considered within the vicinity of any European cathedral and should certainly not be permitted just meters from British Jewry's 'Cathedral synagogue' - it is quite unbelievable. Therefore, I say this planning application is quite unacceptable and must be refused.	NO	Public Access website	13-May-24

24/00021/FULEIA	Benhamou	Tristan	I am writing today to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Weiner	Howie	I have visited Bevis Marks on several occasions due to its cultural and religious importance. It is a beautiful building flooded with natural light as it was designed to do. The construction of a 45 storey tower block next door would no doubt starve the building of natural light. Plus, the building has no electricity and is a Grade I listed building. The fact that the synagogue is still used by its community is even more concerning as it is the only synagogue in the City of London. Bevis Marks should be afforded the same protections as other religious buildings of a similar period, such as St Pauls. Please reconsider plans to build next door to this important place of worship.	NO	Public Access website	13-May-24
24/00021/FULEIA	Robinson	Jessica	I object based on the huge cultural and historical importance of this building to the Jewish and wider community	NO	Public Access website	13-May-24
24/00021/FULEIA	Wrightman	L	This would be terrible	NO	Public Access	13-May-24
24/00021/FULEIA	Roberts	James	The proposal would negatively impact the life of the community at the Bevis Marks Synagogue. It would harm the setting of an extremely important, historic building. It would also negatively impact the worshipping life of this community - the only synagogue in the city of London.	NO	Public Access website	13-May-24
24/00021/FULEIA	Lopez-Salzedo	Shelley	I object	NO	Public Access	13-May-24
24/00021/FULEIA	Yardley	Tracey	I object to this new development damaging as the height and bulk of this 43 storey tower block will dwarf, over-shadow and seriously impair forevermore the present narrow sphere of natural sky entering the courtyard of Bevis Marks synagogue. Lighting is conducive and central to those wishing to pray in a house of worship. In the case of Bevis Marks Synagogue - it basically relies on that existing shadow of daylight and candle light within this house of prayer.	NO	Public Access website	13-May-24
24/00021/FULEIA	Kuttner	Stuart	In years ahead approval of this proposal will be seen as a dreadful, irreversible mistake. Sometimes there must be room for the historic, beautiful and spiritual. This is one of those occasions. In recent years the City I cherish has changed much. Please do not overwhelm the unique Bevis Marks Synagogue which has enriched the City of London for centuries. Stuart Kuttner	NO	Public Access website	13-May-24
24/00021/FULEIA	Mortiaux	Vanessa	Please keep this historical worship place with all the light it deserves.	NO	Public Access	13-May-24
24/00021/FULEIA	Korczyn	Iris	This is a heritage place with historical, current and cultural importance	NO	Public Access	13-May-24
24/00021/FULEIA	Mana-Stein	Galit	I object to this planning.	NO	Public Access	13-May-24
24/00021/FULEIA	Fishman	Rebecca	It is important to show respect to this Jewish place of worship and to the community well as show the deference to this historical site.	NO	Public Access website	13-May-24
24/00021/FULEIA	Howard	Laura	Historic building that should not be knocked down	NO	Public Access	13-May-24
24/00021/FULEIA	Fishman	Oliver	It is completely disrespectful and inappropriate to have this tower block built next to such an important synagogue. The huge nature of the building will affect the light in the synagogue and the important connection to the sky that a synagogue should have. It is a hugely important historical and religious building and the proposed block is out of keeping and completely inappropriate to have in that location	NO	Public Access website	13-May-24
24/00021/FULEIA	Ledermann	Dan	This development will be hugely detrimental to Bevis Marks synagogue which has a profound cultural and historical significance for London (both its residents and visiting tourists).	NO	Public Access website	13-May-24
24/00021/FULEIA	Krigman	Eliza	I object! I can't believe London would consider harming this historic Jewish synagogue. I'm appalled! You must preserve the synagogue	NO	Public Access website	13-May-24
24/00021/FULEIA	Szotten	Ruth	I object to this building as it will negatively impact surrounding buildings particularly the beautiful Bevis Marks synagogue	NO	Public Access website	13-May-24
24/00021/FULEIA	Hall	Sasha	I object to the destruction of this building	NO	Public Access	13-May-24
24/00021/FULEIA	Andreacchi	Gracy	This development would seriously degrade the character of the adjacent Bevis Marks Synagogue, actually the oldest and most historic synagogue in the country. Bevis Marks is of unique importance, not only as an architectural gem, but also as a repository of the collective history and identity of British Jewry. The proposed development will significantly impact the synagogue, cutting off light and air, and overwhelming the ancient building which is already hemmed in by so many large modern buildings. It will also hinder the actual practice of religious rites by blotting out the sky, which shows a shameful disrespect for the free practice of religion. It's of the utmost importance, both to the Jewish community and to the history of Britain, that Bevis Marks retain its original character and not be further impinged by this development. I urge you to reject this development. Thank you for your attention.	NO	Public Access website	13-May-24
24/00021/FULEIA	Sgnaolin	Yoav	The existing building at 31 Bury Street is only 40 years old and is capable of being refurbished and providing good service for many more years. Unnecessary demolition simply squanders the energy embodied in the building. It would also damage the setting of other heritage assets in the local area, and would compromise the qualities of the Conservation Area as a whole. The City Corporation is being disingenuous: claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. We are entitled to expect much higher standards from Britain's most prestigious local authority. As it's been only 2 years or so since a previous development was blocked, so what has changed since?	NO	Public Access website	13-May-24
24/00021/FULEIA	Abramowitz	David	The synagogue should not be over shadowed and be void of natural light	NO	Public Access	13-May-24
24/00021/FULEIA	Cohen	Eran	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. This is a singular building in the entire country, the developers failed before and they're only trying again now because they think they can get away with it while the Jewish community is focused on the war on Gaza.	NO	Public Access website	13-May-24
24/00021/FULEIA	Tanaman	Ruth	The planned tower block would destroy the light in thi old preserved building which would dstroy the character of the worship, being unable to view the sky through the windows, an important part of the services.	NO	Public Access website	13-May-24
24/00021/FULEIA	Preter	Elizabeth	This is irresponsible planning so close to a grade 1 listed historic synagogue, the oldest one in Britain. The height of the building will overshadow the synagogue blocking all light and creating 4 storeys underground threatens the structures of all buildings around it including this listed building. It shouldn't be allowed.	NO	Public Access website	13-May-24
24/00021/FULEIA	Zweig	Michal	Bevis Marks is a listed building which is lit by candles, such a building would block the light from entering the building and make using the synagogue difficult, because Bevis Marks is a listed building and due to the building's historic nature, it is not possible to install electric lighting. It would be inconceivable that such a building were to be built by St. Paul's cathedral, it's unfair that this old synagogue of very great cultural significance, both to Britain and Jews world wide, isn't given the same protection. The building will overshadow the courtyard of the synagogue, reducing its usability for ritual. None of the so-called benefits the developers say they will be providing to offset the negative impact of the building provide anything to the community, nor offset the benefit. The development is within Creechurch Conservation Area; current planning policy doesn't allow such tall buildings in this area. The building blocking celestial bodies, such as the moon, would also make it difficult to engage in Jewish rituals such as the blessing of the new moon and knowing prayer times by the positioning of the sun.	NO	Public Access website	13-May-24
24/00021/FULEIA	Lanceman	Stuart	This would be a travesty against our heritage and multi culturalism of the City of London. People come from all over the world to visit this place and we don't need it plunged into darkness.	NO	Public Access website	13-May-24

24/00021/FULEIA	Lanceman	Stuart	This would be a travesty against our heritage and multi culturalism of the City of London. People come from all over the world to visit this place and we don't need it plunged into darkness.	NO	Public Access website	13-May-24
24/00021/FULEIA	Katz	Sara	This is a fantastic building of British heritage and it would be simply horrible to knock it down!!	NO	Public Access	13-May-24
24/00021/FULEIA	Smouha	Lucy	I strongly object to this application which threatens the oldest synagogue in the Uk	NO	Public Access	13-May-24
24/00021/FULEIA	Benson	Stella	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. My family have been associated with the community for many generations. My late Great Uncle Joshua Cansino is on the memorial board for those killed in the First World War. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this appalling building send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. Bevis Marks is a special and historical building in London and should not be obliterated by new buildings. I urge you to refuse this application.	NO	Public Access website	13-May-24
24/00021/FULEIA	Howard	Angela	I object as this building is of significant cultural interest	NO	Public Access	13-May-24
24/00021/FULEIA	May	Kathryn	A 45 storey tower would completely overwhelm Bevis Marks synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. City planners....where are you?	NO	Public Access website	13-May-24
24/00021/FULEIA	Schonfield	Tamar	The building proposed will overshadow the synagogue. The process of building will create noise and dust for a long period, damaging the spiritual experience of synagogue users. If the current building is no longer useful, a small open space or playground can replace it for the benefit of the local community as well as families attending the synagogue.	NO	Public Access website	13-May-24
24/00021/FULEIA	Cohen	Sarah	This is unbelievable to remove the light of the historical synagogue. This light is needed for the workships. This is part of the life of the city and would be so detrimental to the history of the city.	NO	Public Access website	13-May-24
24/00021/FULEIA	May	Spencer	As a grandson of a member of Bevis Marks, Britain's Oldest Jewish Place of Worship, it is very saddening to learn of a proposal for a 45 Story Tower in such close proximity. As Bevis Marks has kept true to the old ways, they still observe candle lighting and blocking all the natural light would be a devastating tragedy.	NO	Public Access website	13-May-24
24/00021/FULEIA	Barnett	Celia	I strongly object to this proposal. Having restored the etched glass in the windows behind the Ark following the IRA bombing in 1992 I have experience and a connection to the history of the building and a commitment to maintaining its special character and ambiance much emanating from the natural light it receives. The loss of this would be detrimental and unacceptable. My family having been members of the community since it's foundation	NO	Public Access website	13-May-24
24/00021/FULEIA	Joffe	Debbie	OBJECT! this should be a listed building and protected	NO	Public Access	13-May-24
24/00021/FULEIA	Rose	Kalina	The synagogue is of enormous cultural and religious importance, already considerably overshadowed by surrounding buildings, and cannot install additional lighting, even if desired, due to its historic nature. Further darkness would severely degrade the site, both as a cultural icon and as an active house of worship. It's a jewel, it's the only Sephardic synagogue anywhere near the City (the next nearest is in Marble Arch, there is nothing to the East, unless you count the ones in France), and to repeatedly chip away at it in this manner is cultural vandalism, frankly. This proposal is within the Creechurch Conservation Area. Tall buildings are meant to be forbidden, and it's disappointing to have to keep objecting every few years, when another developer wants to have a go - this process needs to be improved.	NO	Public Access website	13-May-24
24/00021/FULEIA	Speyer	Lawrence	The building proposed blocks out daylight and substantially overshadows Bevis Marks synagogue. This is a building of great and religious importance that is in constant daily use still for its original purpose as a place of worship. And it serves a community which my family have been part of for generations - my grandparents and their parents were members, my parents were married there. The plan for the building proposed was already rejected two years ago , there is no reason now to go back on that decision.	NO	Public Access website	13-May-24
24/00021/FULEIA	Wacks	Jude	A development of on this scale would dwarf a historic landmark that has Ment so much to me and my family. As worshippers for all of my life at Bevis Mark's, the disruption on this scale, not to mention, increase of noise, lack of light and other impacts would be devistating for this historic sight that charts my personal heritage and that of the wider Jewish Community in London	NO	Public Access website	13-May-24
24/00021/FULEIA	Green	Miriam	Please preserve this historic and culturally significant building.	NO	Public Access	14-May-24
24/00021/FULEIA	Ruback	Greg	This is a gross over development of the site and will have a significant negative impact on local communities in this area, including, importantly the 300 year old Bevis Marks synagogue which will be left in near perpetual shade.	NO	Public Access website	14-May-24
24/00021/FULEIA	Reynolds	Marie	This development will result in the blocking out of virtually all natural light to the historic Bevis Marks synagogue. It will also completely obscure the view of the sky, stars and moon, the viewing of which is critical to Jewish religious and worship practices. The building of a skyscraper at 34 Bury St also seems in contravention of the area's Conservation status.	NO	Public Access website	14-May-24
24/00021/FULEIA	Appel	Cheryl	To the Planning Commision: I am writing to let you know how valuable the Bevis Marks Synagogue is to me and my heritage, and to express my sadness and frustration that there is once again an application (24/00021/FULEIA) to build around this historical landmark. The proposed application is for a building so high that the sun and the stars would no longer be a part of the experience for the synagogue's members and guests, not to mention those tourists from the local and worldwide community who view the synagogue as a vital link to a vast and rich culture. Sephardic Jews are a minority of the Jewish people, and have endured the Holocaust and the Inquisition, as well as persecution at the hands of their neighbors. Yet there is a dynamic community here, and they deserve to grow and prosper in their sacred space, without being surrounded and diminished by a mega-structure that could be built elsewhere. I hope that I can count on you to reject this application. Sincerely, Cheryl Appel	NO	Public Access website	14-May-24
24/00021/FULEIA	Strum	Daniel	As a historian specialized on early modern history, I object the damage to the historic building of the Bevis Mark synagogue .	NO	Public Access website	14-May-24
24/00021/FULEIA	Bloomfield	Louise	I object, Bevis Marks synagogue must be protected	NO	Public Access	14-May-24
24/00021/FULEIA	Seplowitz	Harry	Strongly object due to adverse impact on nearby synagogue	NO	Public Access	14-May-24
24/00021/FULEIA	Katz	Joanna	I wish to object because the proposed new building should not be allowed to proceed as it clearly impinges on the exciting cultural, historical and religious site.	NO	Public Access website	14-May-24
24/00021/FULEIA	Appleson	Karen	This is the most beautiful building with significant meaning for the Jewish people of London. To demolish it would be horrendous. The historic building needs to be preserved	NO	Public Access website	14-May-24

24/00021/FULEIA	Pearson	Taryn	This is part of UK history. Jewish history. It holds stories of past generations and is still in use today.	NO	Public Access	14-May-24
24/00021/FULEIA	Carr	Kim	I object. This should not be allowed to happen	NO	Public Access	14-May-24
24/00021/FULEIA	Lobel	Vered	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Msika	Emmanuelle	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Ellis	Linda	This Synagogue is a national treasure. Part of the history of Britain.	NO	Public Access	14-May-24
24/00021/FULEIA	Kaye	Lesley	Historical and cultural importance and value	NO	Public Access	14-May-24
24/00021/FULEIA	Levene	Sara	This proposal is incredibly insensitive to the Jewish community. Build a tower so close to the oldest synagogue. Please reconsider, there sre already enough tall buildings in the area.	NO	Public Access website	14-May-24
24/00021/FULEIA	Cohen	Ellen	Too much history to lose. Wonderful building	NO	Public Access	14-May-24
24/00021/FULEIA	Sacks	Deborah	Bevis Marks is extremely important to the British Jewish community. It is far and away the most beautiful synagogue we have and an important part of our heritage. Although I am Ashkenazi, I have a personal connection: my sister was married there and my niece had a baby blessing there. The synagogue should not be compromised by a new development.	NO	Public Access website	14-May-24
24/00021/FULEIA	Tanaman	Baruch	Damage to environment of a protected area including right of light to a special synagogue, only one of its kind, which has been in operation for over 300 years continuosly.	NO	Public Access website	14-May-24
24/00021/FULEIA	Brown	Joshua	Bevis Marks Synagogue is a critical part of the history of Anglo Jewery. The building, which is Grade 1 listed, has been in continuous service for 300 years and hosted my wedding earlier this year. The ceremony was truly magical and the history of the building was tangible. Due to its age and grading, however, there is limited electricity and therefore light in the building. A number of tall buildings already around the site have degraded the light quality. I fear that this application would further degrade the light quality and therefore atmosphere of the building.	NO	Public Access website	14-May-24
24/00021/FULEIA	Hougie	Jacob	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am genuinely shocked to see the developers repeat this rouse. This is one of the most important buildings for both our community and for the heritage of the country. This new skyscraper would represent the manner in which this country has come to worship capitalism as a false idol, symbolically blocking out the sun from a synagogue. It is for exactly this reason that the sight lines of St Paul's are legally protected, yet for Bevis Marks developers bring such Chutzpah as to block out all the sun that remains.	NO	Public Access website	14-May-24
24/00021/FULEIA	Kliman	Sonia	This historic synagogue has stood on this site since the 1700's, one of the oldest in the UK. It is still in regular use today. The proposed development will affect the light and intrinsic aesthetic of this beautiful building. Surely with a bit of forethought the proposed development could be ammended to preserve the enjoyment and aesthetic of Bevis Marks Synagogue for future generations. Those who built this synagogue those who came before them and their descendants contributed in major ways to the prosperity of The City of London and beyond. Is this how their historic place of worship should be treated? I hope and pray that you can see your way to accommodating the needs if the synagogue and its members and visitors for future generations to enjoy. Would you allow other historic places of worship, eg Westminster Abbey or St Paul's cathedral to be so desecrated in the way prposed by the external developers? I should also point out that the Ashkenazi synagogue, Dukes Place, was destroyed by enemy fire in WW2. It was very near Bevis Marks, as can be seen by the blue plaque on the wall. It was a similar age. So Bevis Marks is the only one remaining! Please do not allow it's precious character to be destroyed.	NO	Public Access website	14-May-24
24/00021/FULEIA	Wolfe	Laura	I object.	NO	Public Access	14-May-24
24/00021/FULEIA	Stone	Judith	This development will overshadow Bevis Marks Synagogue to its detriment. This is an historic building and the community should not be deprived light within it.	NO	Public Access website	14-May-24
24/00021/FULEIA	Barnett	Robert	I am a member of family that has been part of the the Bevis Marks congregation for many decades. The synagogue is the core part of our heritage as a community, the abiding centre of our activities and memories. It is of immense importance to the cultural history and diversity of Britain, as well as of London and the City, and a foundational element of the Anglo-Jewish community. I object to this planning proposal on the following grounds: 1. It will further obstruct the already severely limited light available to the synagogue. 2. It will significantly increase shadow and obscure the space and view from the courtyard of the synagogue. 3. It will signfiicantly increase the existing crowding and physical marginalisation of the synagogue, contributing to the perception that it is of marginal or little value or significance to the City and its community. 4. It will create major disturbance during demolition and construction for an extended period of time, in total contradiction to the aims and purposes of the synagogue. 5. It will encourage the wastage on a massive scale of energy source and materials in the process of demolition and reconstruction. 6. It will add nothing of architectural or aesthetic significance to the City of London or its skyline except repetition of what is already there, and is extremely unlikely to last for even one quarter of the time the synagogue has lasted and been of value. 7. It will not be considered of aesthetic or historic value to the City in 50 or so years, unlike the synagogue. 8. It brings no additional value to the city apart from enabling developers to make further profits. 9. Renovation of existing buildings with aesthetic and historic value would prove to be of much greater longterm benefit to the community and the City. 9. The need for further office and retail space in this area is not apparent to me; even if it does attract users, they would likely be drawn from an existing building in the City. I object to the proposal.	NO	Public Access website	14-May-24
24/00021/FULEIA	Hilton	Michael		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Aslet	William	Towering over Britain's most historic -- and arguably its most important -- site of Jewish worship, this proposed scheme is an act of cultural vandalism that would bring shame to the City Corporation. It would block out light to the Synagogue, make the courtyard outside it feel cramped and oppressive, and would doubtless soon be followed by further skyscrapers that would do further damage to the setting of this Grade I-listed building. As an architectural historian of eighteenth-century British architecture, I am keenly aware of the importance of this building not only in Britain's Jewish story, but also in the history of its architecture. With few changes made to it in the more than three centuries since it was built, it is arguably the best-preserved eighteenth-century religious building in the whole country. And the setting of the Synagogue -- in an open courtyard set back from the street that allows for the provision of light in the building -- is absolutely integral to understanding its architecture. To allow the construction of this new building would do irreparable harm to this setting by blocking out its provision of light, as well as making it feel cramped, and in so doing would cause lasting damage to our understanding of this hugely important building.	NO	Public Access website	14-May-24
24/00021/FULEIA	Swaythling	Alistair	This poses a serious risk to the viability of the historic Bevis Marks synagogue. Please ensure this does not go ahead under any circumstances as it threatens one of Britain's most historic buildings.	NO	Public Access website	14-May-24
24/00021/FULEIA	Hyman	Neil	The proposed Bury Street development can only be justified in terms of short-term financial gain, set against a permanent intrusion into more than 300 years of worship at the Bevis Marks Synagogue, damage to the unique architectural scheme of Holland House and an insult to the intentions of the Creechurch Conservation Area. Elsewhere in the City, superficially at least, the mix of historic and large-scale modern buildings works well. But these are times when vast commercial developments have a relevance and purpose. My concerns are that the long-standing cultural importance of Bevis Marks and Holland House will be compromised in the here and now and that the whole City environment is being altered in ways that will be redundant and practically irremediable in just a few generations' time. Please reject the current proposal.	NO	Public Access website	14-May-24

24/00021/FULEIA	Gold	Jessica	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish and Portuguese congregation and our family has celebrated weddings etc at Bevis Marks Synagogue and i am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. This is especially concerning at a time when the Jewish community is feeling so vulnerable . I urge you to refuse this application. Kind regards Jessica Gold	NO	Public Access website	14-May-24
24/00021/FULEIA	Obadia	Anne	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish and Portuguese congregation and our family has celebrated weddings etc at Bevis Marks Synagogue and i am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? In all my 85 years I would not have expected that such a thing could even be considered. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. This is especially concerning at a time when the Jewish community is feeling so vulnerable . Please refuse this application. Kind regards Anne Obadia	NO	Public Access website	14-May-24
24/00021/FULEIA	Levi	Albert	This will destroy the historic character of the synagogue putting it in total darkness and the authentic nature of its being lit by candles.	NO	Public Access website	14-May-24
24/00021/FULEIA	Scott- Norman	Anthony	This is a conservation area and to overshadow this building of cultural religious and historic value would be barbaric and an insult to the current Jewish congregation and to all people with a family connection to it including myself . It was built in 1701 and should outlast all modern office building skyscrapers of no value whatsoever .The synagogue is a Grade 1 building and its southern view of ritual importance would be destroyed . Have some respect please! The synagogue would be largely overshadowed with its courtyard for much of the day making it useless for weddings, funerals and other major events. Why demolish 31 Bury Street rather than improve it .?Why take our precious daylight away ? Please rethink	NO	Public Access website	14-May-24
24/00021/FULEIA	Miller	Abigail	This will completely overwhelm Bevis Marks which is the oldest continued-use synagogue in Europe and a site of national historical importance. I highly object to the application of building the proposed structures.	NO	Public Access website	14-May-24
24/00021/FULEIA	Walden	Sam	This development impinges upon and damages the historic setting and fabric of the building of Bevis Marks Synagogue, which is hugely important in the story of British Jewry.	NO	Public Access website	14-May-24
24/00021/FULEIA	Bowers	Liz	Bevis Marks is way more than just a synagogue, it's a living monument to the remarkable success story that is Anglo-Jewry. It sits in the heart of the city of London, thriving in the face of adversity. It's been holding services continuously for over 300 years - even through the Blitz. It is the embodiment of a community that arrived as refugees, fleeing persecution and nevertheless established itself in the heart of British life. Its stability is our stability and we need it now more than ever.	NO	Public Access website	14-May-24
24/00021/FULEIA	Evans	Judy	My objection to this planning application is in relation to the effect on the historical buildings in the vicinity with particular reference to the Bevis Marks synagogue. This is a very important building in the history of British Jewry and the new development will overshadow this place of worship.	NO	Public Access website	14-May-24
24/00021/FULEIA	Green	Renee	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Zender	Mrs	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Sisso Raz	Alicia	Objection to the following: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR	NO	Public Access website	14-May-24
24/00021/FULEIA	Tragen	Dawn	I object to the demolition to the first synagogue in Britain. This is British heritage. At a time of worsening anti semitism, the destruction of an important British Jewish heritage building sends out a very bad message.	NO	Public Access website	14-May-24
24/00021/FULEIA	Lopes Dias	Alexander	Bevis Marks synagogue boasts continuous uninterrupted worship for over three centuries. I implore you to take the opportunity to experience prayer in this historic building yourself, and experience its historical context. The symbol of this community is that of Abraham's tent, open on all sides. So too, is this beautiful house of worship open to members of all faiths and nations offering an opportunity to experience centuries old customs and emotive prayer services. Tell me, how is it possible to turn your eyes to the heavens (the synagogue itself is called "gates of heaven" in Hebrew) in prayer when the lights have been diminished by the City of London. The Community have spent centuries shining light outwards with charity, academic achievements and contributions to British society. I implore the City of London to repay this wonderful community by allowing the light to shine inwards for many more years to come.	NO	Public Access website	14-May-24
24/00021/FULEIA	ADAMS	CHARLES	Dear Sirs I object to the application on grounds of light loss and noise. There will be more than unreasonable light loss affecting the synagogue's ability to hold services and practise certain customs, and use the synagogue's own area in certain ways at ritual timer. There will be inevitable added noise, the added surrounding area parking issues. Yours respectfully	NO	Public Access website	14-May-24
24/00021/FULEIA	Bowles	Lauren	I object due to the impact on Bevis Marks.	NO	Public Access	14-May-24
24/00021/FULEIA	Selwyn	Rebecca	This obstructs historic Bevis Marks Synagogue, a building of immense public value, both historically and currently as it is in use for services to this very day as it has been for hundreds of years. It is an appalling choice to attempt to build this skyscraper in such proximity to a much beloved synagogue, one so valuable to the narrative and life stories of Britain's Jewish population.	NO	Public Access website	14-May-24

24/00021/FULEIA	Israel	Marcel	The quite traditional and famous Synagogue needs as a Temple a free area around it and this is not compatible at all with the erection of high buildings in the immediate vicinity	NO	Public Access website	14-May-24
24/00021/FULEIA	Bronzite	Ruth	Bevis Marks is the oldest synagogue in the UK, and the oldest in the whole of Europe to have 300 years of continuous services. Moreover it is now in a conservation area. The new planned building would tower over it and, even in its reduced height, would cast a gloomy pall over the synagogue's interior during services and other events such as weddings. It would be a desecration of a beloved and holy building to despoil it with a totally insensitive and inappropriate tower building so close to it. We are all now aware that many people who work in offices no longer work in the City, but work from home several days a week. This will reduce the need for mammoth-size offices and will hopefully enable the Council to turn down an insensitive and inappropriate development in its present form.	NO	Public Access website	14-May-24
24/00021/FULEIA	Korn	Daniela	This is a historic building of great significance and should not be demolished	NO	Public Access	14-May-24
24/00021/FULEIA	Rabson	Jonathan	Detrimental impact on historic synagogue Bevis Marks	NO	Public Access	14-May-24
24/00021/FULEIA	Ferera	Leon	I object because the proposal will hugely obstruct the light and visibility of Bevis Marks, a beautiful and unique historic landmark. It will also adversely and irreparably affect its setting.	NO	Public Access website	14-May-24
24/00021/FULEIA	Westman	Jula	I cannot imagine this type of plan being permitted by somewhere such as Westminster abbey or Coventry cathedral It could be thought that such a disregard for the Bevis Marks smacks of antisemitism	NO	Public Access website	14-May-24
24/00021/FULEIA	Press	Dan	Bevis Marks in the City of London is Europe's oldest continuously functioning synagogue and the single most important historic site for British Jews. That unique history nearly ended in 2021, when the planning department recommended approving a tall building at 31 Bury Street, overshadowing the secluded courtyard where the synagogue is situated, obstructing the view of the sky that is integral to its character, and blocking so much sunlight that the congregation would struggle to hold services. A massive public campaign prompted a change of heart. Now the developer has submitted a new application for this highly contentious site. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection. It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The City's failure to consider the religious and cultural dimensions of the synagogue will cause outrage. We urge the City's planning committee to protect the view of the sky from Bevis Marks's historic courtyard. This is essential to preserve the synagogue as a living community for generations to come.	NO	Public Access website	14-May-24
24/00021/FULEIA	Magnus	Alfred		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Baum	Dennis		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Soccio	Caroline	This is a piece of our history. The British Jewry has an important part in both, individuals and our community	NO	Public Access website	14-May-24
24/00021/FULEIA	Goffe	Jude		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Musikant	Adam		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Sikking	Mary	I wish to object to the proposed development on the grounds that a building of this design and height will have an aesthetically adverse effect on a building of such significance in terms of history, age and beauty.	NO	Public Access website	14-May-24
24/00021/FULEIA	Foreman	Bridget		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Halon	Sally	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Copisarow	Katharine		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Lee	Lealiza	Please maintain the historic character of London and the distinctive quality of this landmark	NO	Public Access	14-May-24
24/00021/FULEIA	Ridgeway	Pauline Golda	I object to this. It is the oldest synagogue and has a magnificent history.	NO	Public Access	14-May-24
24/00021/FULEIA	Lurie	Kate	I object as this removes the natural light from a beautiful old building.	NO	Public Access	14-May-24
24/00021/FULEIA	Hills	Christine		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Shapiro	Melissa	England's oldest synagogue (and indeed, the oldest continued-use synagogue in Europe) is located in the heart of the City of London and should be preserved as an historic landmark.	NO	Public Access website	14-May-24
24/00021/FULEIA	Seymour	Ulla-Britt	This is such a heritage for the Jewish community in Kindon	NO	Public Access	14-May-24
24/00021/FULEIA	Isaacs	Jonathan		N/A	Email (attached in DC- received by email file)	14-May-24
24/00021/FULEIA	Bekhor	Joseph	I am writing to express my opposition to this application (24/00021/FULEIA). I am perplexed as to why this proposal should be considered given its similarity to the previously refused proposal, and in particular given the adoption of the Creechurch Conservation Area. As a member of the community to which Bevis Marks Synagogue is part, I am particularly concerned about the impact this proposal would have on the Synagogue, most notably the impact on light. I hope that you refuse this application.	NO	Public Access website	14-May-24
24/00021/FULEIA	Goldstein	Michael	I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	14-May-24

24/00021/FULEIA	Sacerdoti	Daniel	I write as the Chair of Trustees of the Spanish and Portugese Jews Congregation, the custodians of the Grade 1 listed Bevis Marks Synagogue. I wish to register my strong objections to this application (24/00021/FULEIA). I am shocked that after the refusal of an almost identical application two years ago and the recent adoption of the Creechurch Conservation Area, that this application has even been made. The scheme has barely changed since the previous (rejected) scheme. Nor is it in keeping with the conservation of a Grade-1 listed building, which is situated within a conservation area. Bevis Marks is the most important site in anglo Jewry and one I am proud to be partially responsible for. The proposed tower would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, robbing it of much of its remaining light. Such a proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I respectfully urge the planning officers and the Members of the Corporation to reject this scheme and to undertake to protect the unique living treasure that is Bevis Marks.	NO	Public Access website	14-May-24
24/00021/FULEIA	Braude	Sheila	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Marx	Jeanette	Important and historical building and heritage of the Jews in London and the UK. It's also an important tourist attraction. The very oldest, and still in use, Synagouge in the UK	NO	Public Access website	14-May-24
24/00021/FULEIA	levinson	sharon	I strongly object to this. one of our oldest buildings and a piece of our heritage and history	NO	Public Access	14-May-24
24/00021/FULEIA	Hood	Sharon	Absolutely object	NO	Public Access	14-May-24
24/00021/FULEIA	Peters	Kathy	This building is of such great historical and religious significance. It is about time everyone recognised this. The proposed development should be turned down.	NO	Public Access website	14-May-24
24/00021/FULEIA	Brenner	Don	Just what have the planners got against The Bevis Marks Synagogue...this is the second time they have tried to blight this wonderful and important London landmark and it should simply not be allowed. No doubt the architects will say everything will be done sympathetically and that the Synagogue will not be affected but how can that be guaranteed? This application to build should be turned down in no uncertain manner....leave Bevis Marks alone!!	NO	Public Access website	14-May-24
24/00021/FULEIA	Goodenough	Sharon	As someone who worked in the City for nearly 30 years, most recently very close to the location of this proposed development, it saddens me that a number of perfectly acceptable buildings are being demolished to make way for, in many cases, monstrous skyscrapers. One of the joys of working in, and visiting, the City of London is the range of architectural styles on view - 18th, 19th, 20th and 21st centuries; the planners appear to have taken the view that anything other than 21st century is obsolete. The plans for 31 Bury Street illustrate this point. The proposed 43-storey tower would completely overwhelm the surrounding buildings, in particular the Grade 1 listed Bevis Marks Synagogue, a building of international importance. In addition, proposing to build such a tower in a conservation area (Creechurch) is surely completely at odds with the purpose of creating a conservation area. I hope that these plans do not receive approval.	NO	Public Access website	14-May-24
24/00021/FULEIA	Peever	Silvana	I am a supporter of Bevis Marks Synagogue from Canada and am concerned to see this new proposal, particularly after the refusal of a very similar one just two years ago and the recent adoption of the Creechurch Conservation Area. The application is not in keeping with a Grade-1 listed place of worship. The seventeenth-century Bevis Marks Synagogue and its soon to open education center is the most important Jewish site in England and a jewel in the crown of world Jewish heritage and the Sephardi tradition of which I am part. The proposed tower, to the immediate south, would block out the religiously important southern sky-view and completely overshadow the Synagogue and its courtyard, blocking all remaining light. I consider the planning application to be totally unacceptable and urge you to refuse it.	NO	Public Access website	14-May-24
24/00021/FULEIA	Borr	Barry	This is threatening our Jewish heritage at a time when Jews worldwide are under threat.	NO	Public Access	14-May-24
24/00021/FULEIA	Young	Diana	Bevis Marks is the only synagogue in the square mile. It is also the oldest synagogue not only in the UK but in Europe. It relies on natural light and candlelight and would be badly affected by this tall tower block. Bevis Marks is a Grade 1 listed building and its heritage should be respected.	NO	Public Access website	14-May-24
24/00021/FULEIA	Israel	Ruth	This is a heritage site and need to be respected	NO	Public Access	14-May-24
24/00021/FULEIA	Orgel	Esti	I object, this is an important part of our history. This synagogue means a whole lot.	NO	Public Access	14-May-24
24/00021/FULEIA	Raingold	Jo	This is a building of great historical importance to the Jewish community of Great Britain. It should not be forced to be demolished it would be removing a building of huge cultural importance and is culturally very insensitive	NO	Public Access website	14-May-24
24/00021/FULEIA	Marks	Joshua	The current proposal risks significant damage to the character and heritage of Bevis Marks synagogue, the oldest active synagogue in the UK and a Grade 1 listed building. The historian Tom Holland described a previous similar proposal as a 'disgrace', explaining 'Bevis Marks is Britain's single most historically significant monument to the role played by Jews in national life.' I agree with Holland that it should be afforded some protections in line with its special status.	NO	Public Access website	14-May-24
24/00021/FULEIA	Collovini	Chiara	I strongly object to the building of a 43 storey skyscraper.	NO	Public Access	14-May-24
24/00021/FULEIA	Brand	Vadim	Bevis Marks, the oldest synagogue in the UK and oldest continued-use synagogue in Europe is located in the heart of this capital. The proposed application of such a tall construction project which will endanger its rights to light/ongoing structure, and indelibly change its historic setting within the strata of history and culture that make up London city. It is a representation of diverse Sephardic heritage and a cultural archive of the continuous record of Jewish life in Britain. To build allow construction of such large building to shadow this synagogue represents a further cast of Jewish life and culture into the shadows. Please deny this such building application to keep the diversity of the neighborhood front and present.	NO	Public Access website	14-May-24
24/00021/FULEIA	Goldstein	Ralph	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	14-May-24
24/00021/FULEIA	Rothband	Nicole	This development so close to a historic synagogue is inappropriate. The proposed height of the development will overshadow the synagogue structure to such an extent that it will block out almost all light.	NO	Public Access website	14-May-24
24/00021/FULEIA	Levenson	Yoel	This synagogue is a priceless bit of British Jewry's history.	NO	Public Access	14-May-24

24/00021/FULEIA	Keats	Michael	The proposed development: -Will cause substantial harm to the setting of Bevis Marks Synagogue. -Stands within a Conservation Area and thus violates the City of London policy of Tall Buildings which states that the City will refuse planning permission for tall buildings in conservation areas -Will have a serious, negative impact on the synagogues ability to carry out religious rituals such as the monthly viewing of the moon For this and many other reasons it should be refused	NO	Public Access website	14-May-24
24/00021/FULEIA	Austen	Amanda	I object as it is not respectful Of the shul	NO	Public Access	14-May-24
24/00021/FULEIA	Videtzky	Joanne	I strongly object	NO	Public Access	14-May-24
24/00021/FULEIA	Krom	Jodie	Impact on Bevis Marks synagogue	NO	Public Access	14-May-24
24/00021/FULEIA	Landau	Rachel	I object!!!	NO	Public Access	14-May-24
24/00021/FULEIA	Gouldman	Judith	Would infringe on Bevis Marks synagogue natural light, destroying the ability to worship with the synagogue and the character of the grade 1 listed building.	NO	Public Access website	14-May-24
24/00021/FULEIA	larchy	Marc	Building such a skyscraper would overshadow a historic synagogue and greatly diminish it's charm. These arguments were all made 2 years ago when a 48-floor tower was proposed, and reducing it to 45 floors don't change the negative impact on the light, environment and charm of Bevis Mark's synagogue.	NO	Public Access website	14-May-24
24/00021/FULEIA	Leventhal	Michael	I am a Jewish publisher and historian living in north London and am writing to object to the above-numbered planning application. I have written about the importance and historic significance of Bevis Marks synagogue in a book published some years ago and I feel strongly that the application will have a very negative impact on the building. The new tower block would block out the crucial southern view of the sky and shut out the light that comes into the courtyard. I urge you to reject this application. Yours sincerely, Michael Leventhal	NO	Public Access website	14-May-24
24/00021/FULEIA	Okrent	Sara	Bevis Marks Synagogue is of historic value to the whole of Anglo-Jewry and this development is a threat to this important Grade 1 listed building	NO	Public Access website	14-May-24
24/00021/FULEIA	Gold	Paul	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I've been a member of the Spanish and Portuguese congregation 25 years and our family has celebrated weddings etc at Bevis Marks Synagogue and i am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. This is especially concerning at a time when the Jewish community is feeling so vulnerable . Please refuse this application. Kind regards Paul gold	NO	Public Access website	14-May-24
24/00021/FULEIA	Gold	Isabel	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish and Portuguese congregation my family has celebrated weddings etc at Bevis Marks Synagogue and i am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. This is especially concerning at a time when the Jewish community is feeling so vulnerable . Please refuse this application. Kind regards Izzy Gold	NO	Public Access website	14-May-24
24/00021/FULEIA	Rubin	Suzanne	Damage to a historical building namely bevis marks synagogue	NO	Public Access	14-May-24

24/00021/FULEIA	Gold	Elijah	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). im a member of the Spanish and Portuguese congregation and my family has celebrated weddings etc at Bevis Marks Synagogue and i am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. This is especially concerning at a time when the Jewish community is feeling so vulnerable . Please refuse this application. Kind regards Elijah gold	NO	Public Access website	14-May-24
24/00021/FULEIA	Cousin	Yocheved	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Segal	Richard	I strongly object to this planning application. Bevis Marks Synagogue is a Grade 1 Listed building of enormous historic and cultural significance. A 45 storey tower would completely overwhelm the synagogue and destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the contribution to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked by a 45 storey tower. The development would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. I understand that because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. This should make it straight forward to reject this application. In addition, from a sustaiability perspective, how can it be right to allow the existing building at 31 Bury Street, which is only 40 years old, to be demolished. Surely from a carbon emissions perspective, the existing building should be refurbished rather than demolished. Unnecessary demolition simply squanders the energy embodied in the building. There must be many better sites in London for a new building of this size and height. This application should be rejected. I strongly oppose this application.	NO	Public Access website	14-May-24
24/00021/FULEIA	Shenker	Stephen	The proposed development will overshadow Bevis Marks synagogue	NO	Public Access	14-May-24
24/00021/FULEIA	Pearl	Jennifer	The building will change the environment and stop light getting into the building and will probably disrupt wheelchair access for me when I want to attend the synagogue.	NO	Public Access website	14-May-24
24/00021/FULEIA	Barkan	Limor	I object	NO	Public Access	14-May-24
24/00021/FULEIA	Stevens	Rich	Don't Respect Jewish History	NO	Public Access website	14-May-24
24/00021/FULEIA	Weiss	Maxime	This proposed building threatens England's oldest synagogue (and indeed, the oldest continued-use synagogue in Europe). I am pro industry and a thriving economy, but not at the expense of ongoing culture and spiritual worship, or of a vital piece of UK and anglo-jewish history. 31 Bury as designed will endanger Bevis Mark's rights to light/ongoing structure, and indelibly change its historic setting within the strata of history and culture that make up London city. This is not only a historical conservation issue but also an issue of compromising the cultural practices of the community who uses the space. Allowing this building would be a planning hypocrisy and certainly a breach of the Equalities Act.	NO	Public Access website	14-May-24
24/00021/FULEIA	Lavi	Roslyn	I object building near and over this important historical sight blocking its light.	NO	Public Access	14-May-24
24/00021/FULEIA	Ross	Reva	By allowing the planning permission to be granted the new building will be blocking the light to a 300 year old Synagogue that is of historical importance to the Jewish Community of England and to the local community in the City.	NO	Public Access website	14-May-24
24/00021/FULEIA	Wilks	Anne	The plan is prejudicial to the unique historic landmark of the beautiful, prized Bevis Marks Synagogue, still much enjoyed today, a jewel in the crown of Anglo-Jewry and a badge of honour for Anglo-Jewish relations.	NO	Public Access website	14-May-24
24/00021/FULEIA	GLATMAN	Zara Ruth	The planning application if it is successful will be harmful to the Bevis Marks synagogue and site This is a very old wonderful building of great historic architecture and I believe one of the earliest synagogues in London. People come from all over the world to visit and also to take part in many religious services and events. It would be z crime to put yet another shiny modern building next to it and cause damage.	NO	Public Access website	14-May-24
24/00021/FULEIA	Israel	Adrien	Protect our heritage	NO	Public Access	14-May-24
24/00021/FULEIA	Sher	Nicky	It is a building of heritage and can't ge destroyed	NO	Public Access	14-May-24
24/00021/FULEIA	Kaufman	Martin	I am writing to object to this planning application which will overshadow one of the most important historic buildings in the City of London, the Bevis Marks Synagogue, the oldest Jewish religious building in the country. The City welcomed the Jews in the 17th century, and ever since Jewish men and women have played an important part in the life of the City. In a time of growing antisemitism, now is the time to celebrate the story of diversity that is represented by Bevis Marks, and to celebrate, not denigrate, its heritage for all, whether or not Jewish. For the sake of the future heritage of the City, I sincerely hope this application will be rejected.	NO	Public Access website	15-May-24
24/00021/FULEIA	Marcus	Lucy	I object	NO	Public Access	15-May-24
24/00021/FULEIA	Mendleson	Elizabeth	The building proposals will affect the historic and unique building that is Bevis Marks Synagogue. The re-development must not and cannot go ahead.	NO	Public Access website	15-May-24
24/00021/FULEIA	Bedarida	Gabriella	The historical and diversity value of the Bevis mark synagogue would be destroyed . The new project would bring darkness, noise and traffic in a quiet corner of the city where everybody should be able to value the success story of how Jews integrated and contributed once they were allowed back in england	NO	Public Access website	15-May-24
24/00021/FULEIA	Chalibamba	Michelle	Bevis Marks is the oldest Synagogue in the UK. It is a place steeped in Jewish history. But also a place that represents And celebrates the history of the city of the Migrant population to this area Anything that threatens integrity of the building Should not be allowed I strongly object to this proposal	NO	Public Access website	15-May-24

24/00021/FULEIA	Madeira Filipe	Andre	The potential obstruction of natural light to Bevis Marks synagogue due to the proposed development raises legitimate concerns. While it may seem like a minor detail to some, the uninterrupted flow of light into the synagogue is integral to its regular functioning and the overall atmosphere within. Bevis Marks is not just a historical relic; it's a living testament to the enduring spirit of world Jewry and a symbol of religious tolerance in this country. In so many ways it's a beautiful symbol of redemption with significance that goes beyond the borders of the City and even the UK. Preserving its functionality is essential to maintaining its significance as more than just a museum piece but as a centre of worship and community for centuries to come. Its elegant discreetness motivated by historical constraints, should not serve as a green light for authorities to shun its significance. On the contrary, efforts to increase its visibility should be undertaken.	NO	Public Access website	15-May-24
24/00021/FULEIA	Klein	Mark	The bevis Marks synagogue is a cultural and historic site, you would not do this to St Paul's where there has been much development in the past decade. To appreciate Bevis marks we need as much natural light and nothing which could compromise the structure of the building. The proposed development is a blemish to both	NO	Public Access website	15-May-24
24/00021/FULEIA	Piper	Esther	How can this development be allowed next to a significant grade 1 building! Is this because Bevis Marks is a synagogue and Jews don't matter? Would this be allowed next to any other grade 1 building ?	NO	Public Access website	15-May-24
24/00021/FULEIA	Cohen	Amalya	Bevis Marks synagogue is a hugely important building and Jewish community that has been in operation for over 300 years. It forms part of the story of religious faith in the UK and is of great historical significance. The planned works around the building threaten its unique architectural character and the means by which the community prays. Unlike other religious buildings in the UK, Bevis Marks is unique for its candle-lit services that continue a tradition of prayer that has existed for hundreds of years. By blocking out sunlight around the building, this will make this special service impossible and risks losing an important aspect of cultural patrimony in the UK.	NO	Public Access website	15-May-24
24/00021/FULEIA	Cohen	Judith	The proposed development will overshadow Bevis Marks synagogue, an important part of East End history and a minority heritage site. It is also a listed building. Previous planning applications have been refused on this basis so it's extraordinary that yet another one is being considered. The City of London is responsible for protecting its heritage - this historic Jewel of Anglo Jewry deserves better than to be left in a dingy, lightless, overshadowed corner.	NO	Public Access website	15-May-24
24/00021/FULEIA	Baer	Michael	Bevis Marks isn't just a synagogue, it's a living monument to the remarkable success story that is Anglo-Jewry. It sits in the heart of our nation, thriving in the face of adversity. It's been holding services continuously for over 300 years - even through the Blitz. It is the embodiment of a community that arrived as refugees, fleeing persecution and nevertheless established itself in the heart of British life.	NO	Public Access website	15-May-24
24/00021/FULEIA	Valencia	Esther	My family named Cohen Lobatto/Palache has been at Bevis Marks since its founding in the 1600s. It is very special in that it is considered a heritage listed building and the continuation of special buildings in The City of London. No high rise buildings should be allowed to damage this wonderful ancient congregation	NO	Public Access website	15-May-24
24/00021/FULEIA	Vogel	Michele	The Bevis Marks Synagogue is of great cultural and historic importance. A tower block next to it would overshadow the synagogue, being too high for the area and also blocking out light for this old building which has no electricity and requires daylight and views of the sky I do hope you will reconsider this planning application Thank you	NO	Public Access website	15-May-24
24/00021/FULEIA	Wilton-Morgan	Taylor	As a clergyman in the City of London, I wish to register my objection to the proposed development, on the basis of the existential threat this poses to the Jewish community at the Bevis Marks Synagogue. The development would dramatically reduce light levels, making many ceremonies inside the Synagogue extremely difficult, and dramatically impoverishing its atmosphere. More significantly, it would totally obscure view of the moon and some stars, meaning the central rituals of prayers at the new moon, and the observance of Shabbat, would be impossible. This would render the Synagogue functionally useless as a living and worshiping community. A looming tower block would also, in present circumstances, pose a significant security concern for the safe use of the site. Bevis Marks is the only non-Christian place of worship in the City of London, and the oldest continuous site of Jewish worship in the world. Since its building in 1701, many families can trace continuous involvement through marriages and other rites of passage there. It is a priceless place of heritage, of international importance, but it is *much* more than a museum: it is the site of a living tradition, whose ethical heritage underwrites so much that the City of London values. What would the City be without such communities of human flourishing, placing us in touch with fundamental moral questions? And what kind of people would we be, if we ignored just how imperiled the Jewish community feels at this moment? The proposed development is an existential threat to them: thus it should be an existential concern for us all. Clearly the City must make difficult decisions about planning. It is not clear, however, that development should come at the expense of an imperiled minority group's right practise their vision of human good - a good which they firmly believe is for 'tikkun olam' (the 'repairing of the world'). Thus, with other clergy and Christians in the City, I firmly object to this proposal.	NO	Public Access website	15-May-24
24/00021/FULEIA	Levy KC	Robert	The notion that such an enormous building should be built in such close proximity to Bevis Marks Synagogue is quite monstrous. A similar, offensive, application, has, I believe, been recently rejected and the current one seems to me no better, in terms of proximity, the impact on London's oldest and most historic functioning synagogue. The proposed development would impact such views as are left from this important heritage, Grade 1 listed, building as well as diminish its light, which is of particular importance in view of the already poor light at the synagogue and its use of candles for illumination. I understand the synagogue is in a Conservation Area, and the proposed new building would dominate its setting. Further, a four storey basement being excavated in such close proximity to a pretty ancient synagogue could well impact its structural stability; in view of the date of its construction it is unlikely that Bevis Marks enjoys the structural integrity of more modern buildings. This application is, to all intents and purposes, a cynical rehash of a recently dismissed application and should be rejected.	NO	Public Access website	15-May-24
24/00021/FULEIA	Flower	Isabelle	The proposed development is completely out of keeping with the conservation area and inappropriate given the nearby setting of various listed buildings and heritage assets. The proposed development would rob Bevis Marks of even more daylight, and the proposed 'benefits' of the development ring hollow and are merely the bare minimum expected from any development.	NO	Public Access website	15-May-24
24/00021/FULEIA	Palmer	Joel	Negative impact on Bevis Marks Synagogue	NO	Public Access	15-May-24
24/00021/FULEIA	Mourtzilas	Georgios Michail	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24

24/00021/FULEIA	Jackson	Michael	Allowing this planning application would be a huge mistake - encouraging other tower blocks to tower over protected buildings. The case has been made many times, but it is important that you know how vital it is to prevent this from happening.	NO	Public Access website	15-May-24
24/00021/FULEIA	Erginsoy	Ali	I am deeply concerned about the impact of this development on the historic Synagogue of Bevis Marks, the oldest synagogue in continuous use in England. The development will affect the quality of worship by blocking out natural light and adversely impact the architectural fabric of the historical building. It is also inappropriate in scale because of the proximity to the synagogue. I feel it would be unthinkable to attempt to site such a building adjacent to St Paul's, so why the cathedral synagogue of the Spanish & Portuguese Jews' Congregation, a community that was established in 1656? Previous attempts of a similar nature were rightly rejected by the planning authority and this should too.	NO	Public Access website	15-May-24
24/00021/FULEIA	Jackson	Judith	Allowing this planning application would be a huge mistake - encouraging other tower blocks to tower over protected buildings. The case has been made many times, but it is important that you know how vital it is to prevent this from happening.	NO	Public Access website	15-May-24
24/00021/FULEIA	Julius	Lyn	As a former editor of the Sephardi Bulletin I have visited the synagogue on many occasions. I would object to any development that would further block out the light from this wonderful historic building.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sneader	Philippa	31 BURY STREET I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm extremely disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. As a young child we would visit the synagogue regularly and my family has been involved there for many generations. I was married there, as were my siblings, parents and grandparents. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Swade	Shelley	Together with many many others, I strongly oppose this new proposal, introduced after a similar proposal was rejected previously. This is a conservation area containing the most important Jewish site in the UK. Not only is it historically of enormous importance but it is also a site of contemporary Jewish life. The proposal would irrevocably alter the setting and shut out the remaining light, overshadowing and dominating the synagogue and its courtyard. It is essential that this development, and any comparable one, never goes ahead and I urge you to reject it.	NO	Public Access website	15-May-24
24/00021/FULEIA	Hakim	Robert	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). My family are longstanding members of the Spanish & Portuguese Jewish community and we are very disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application is barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and impacts the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Pinch	Sarah	Ruining the local synagogue next door	NO	Public Access	15-May-24
24/00021/FULEIA	Pereira-Mendoza	Marc	In a world where we pay less and less attention to an active preservation of the past and in particular the uniqueness and exceptional history of a building such as Bevis Marks, the Corporation must pause and take stock of the objections surrounding this proposed project. There is no doubt that a 45 storey old tower would overwhelm the synagogue optically, physically and crucially from a lighting perspective. There is limited scope to improve the lighting within the synagogue itself given its Grade 1 status and would also overshadow the courtyard area which has been used for many years for rituals and celebrations such as weddings (including my own). Furthermore, I understand that the proposed development is within the Creechurch Conservation Area which should not allow for tall buildings and many of the arguments offered by the developer in supporting their application seem somewhat tenuous - especially from an environmental and sustainability perspective. Bevis Marks will soon have a museum and visitors centre which has taken years of hard work to accomplish and will sit within the site and the success of that initiative to attract visitors will also be reliant on both the aspect and light falling across the area. More importantly this building serves as a historical gem of unparalleled significance, not just for the Jewish people, but for this country as a whole in the way that it has served as a beacon of light for those fleeing oppression and looking to contribute to broader society - please do not allow the light surrounding it to be extinguished.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dias	Daniel	I would like to register my objection on the grounds of damage to the spiritual experience of worshiping at Bevis Marks Synagogue. My family have worshiped at this synagogue for 200 years, my family, and my grown up children are also members. Bevis Marks is a unique place, with an unmatched ambiance, the building resonates with the melodies and prayers of multiple generations. I defy anyone not to feel the spiritual significance of Bevis Marks, if one cares to visit. To damage this would be a travesty for the City of London, I am all for progress but surely some things should be sacred. I hope common sense prevails and this historic home of a community so deeply linked to what it means to be the City of London, a greater community built on tradition and integrity, will be protected for many more generations.	NO	Public Access website	15-May-24
24/00021/FULEIA	Saleh	Ruth	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24

24/00021/FULEIA	Kay	Gideon	A 45 storey tower would completely overwhelm the Bevis Marks synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible.	NO	Public Access website	15-May-24
24/00021/FULEIA	Rowland-Hill	Michael	The Bevis Marks synagogue is one of the CIty's most beautiful and historically important buildings. I am not Jewish, but I love and appreciate this building as a living reminder of our past - how this country can be proud to have welcomed refugees. Bevis Marks is a magical place to visit for Jews and non-Jews alike. This new development will literally overshadow and therefore demean this historic and religious building. It is a Grade I listed building and it is at moments like these that it really needs your protection. Please let the synagogue and all it represents be your number one thought above profit and business and short-term thinking. Thank you for your consideration.	NO	Public Access website	15-May-24
24/00021/FULEIA	Margetson	Zanine	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a a member of Bevis Marks' Spanish & Portuguese Jewish community and frequent visitor to the synagogue I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, has barely changed since the last time it was submitted, and is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to please refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Macmull	Ira	The Bevis Marks Synagogue is an historic building which should be respected as such and should not be overshadowed by yet another high rise building which would diminish the stature of this remarkable landmark.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dias	Lorraine	Light	NO	Public Access	15-May-24
24/00021/FULEIA	Martins Dos Santos	Jonatan Ismael	The synagogue was built in 1701. Twelve years later The Bill of Rights was made official in the country, marking a new departure for our Western values of freedom and democracy. Eighty-eight years later the American Constitution was established, which is still known for advocating for religious freedom. More recently, the International Human Rights and European Human Rights were mainly based on these laws. When this synagogue was built, Jews were openly executed in Spain and Portugal. Even if they were Catholic converts, but they kept any single of the practices of their ancestors, it meant they would be eligible for execution. It wasn't until 1976, approximately, that many of the descendants of those Jews, in Portugal, decided to embrace the faith of their ancestors publicly. While in London, more than three hundred years ago, they could build synagogues and enjoy a free life. Even today, our mayor, Sadiq Khan, has installed over thirty thousand lights for Ramadan in Central London, while in so many countries, religious freedom is far from being a reality. The most interesting thing is that we are in an era of inclusivity, fluidity, and diversity of any kind. Yet, a synagogue that was built one hundred and eighty years before Tower Bridge, and one hundred and fifty years approximately before Big Ben, seems to be less important than those two emblematic buildings. I wonder if our Western values of freedom and democracy matter, as so many people coming from authoritarian countries, where they can be executed for anything that deviates from the official values, find this to be a sanctuary. But it is nothing new, as it was already happening in 1701 when this synagogue was built. So, if the mayor spends money on lavishly celebrating Islam, why aren't we allowed to keep a historical building? Older than Tower Bridge and Big Ben? If a symbol of the city and the values of the West receives such poor treatment, I wonder what is coming next.	NO	Public Access website	15-May-24
24/00021/FULEIA	Kotlowski kinsley	sharna	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm very keen to preserve a historical jewish synagogue that is of enormous meaning to me. Im appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	SICSIC	Laurent	I'm strongly opposing to this new application (24/00021/FULEIA). I'm a long standing member of Bevis Marks' Spanish & Portuguese Jewish community and I just am appalled and concerned to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application is almost identical to the previous one and doesn't comply with the conservation of a Grade-1 listed building, which is now also in a conservation area. Bevis Marks' Synagogue is the most important Jewish site in the UK and the building and its community should be considered with all due respect. The new tower, immediate south to the synagogue, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal is almost disrespectful and would never be considered within the vicinity of St Paul's Cathedral. It should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24

24/00021/FULEIA	Silver	Jason	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Nunes	David	Damage to daylight lighting at Bevis Marks synagogue	NO	Public Access	15-May-24
24/00021/FULEIA	Webber	Jonathan	My wife and I were married in this historic synagogue 30 years ago, and we are proud to be members of this congregation. My grandfather was the Executive Secretary of the Spanish & Portuguese Jews community for literally fifty years, and he had his office in the building alongside. So I grew up with a very strong awareness of the family tradition regarding the truly magical character of Bevis Marks Synagogue, and even though we do not live now in the UK we remain with that memory to this day--especially the memory of the quality of the light during our wedding ceremony. For its part, the congregation has assiduously preserved and continues to preserve the architectural beauty of the building, both inside and outside, down to its smallest details. It is hard to believe that the City of London could even consider an application for development which would very substantially damage the authenticity of the site by allowing a new structure to literally overwhelm it, not to mention the disastrous effects of blocking natural light permeating the interior, something which otherwise lends true grandeur to the ancient ceremonies and music which take place there. The Bevis Marks Synagogue is unquestionably unique, a most valuable jewel of the City of London. Please, please, continue to protect it and do not allow this scheme to go ahead.	NO	Public Access website	15-May-24
24/00021/FULEIA	Ozer	Ketty	I am a member of the Spanish & Portuguese Congregation and I wish to strongly object to the application of development of the Creechurch Conservation Area which seems to have been resubmitted with a minor change of reducing the height of the building by a couple of floors only. This is not in keeping with conservation of a Grade-1 listed building, which is now also in a conservation area; the most important Jewish site in the UK. If this project goes ahead, the new tower to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky view and overshadow the synagogue and its courtyard, reducing the remaining light. Equally important, in this time of virulent antisemitism, it is a huge security risk with any potential terrorists having a full view of the synagogue courtyard with easy access to commit horrendous acts of terrorism against the Jewish congregation. How can this be allowed? It will be inconceivable to allow such a proposal within the vicinity of St Paul's Cathedral and rightfully so, but equally should not be permitted meters from British Jewry's oldest and most revered synagogue either, especially the sensitive southern exposure. This is madness and a callous betrayal of the members of our congregation. I ask that you please refuse this application. Thank you Ketty Ozer	NO	Public Access website	15-May-24
24/00021/FULEIA	Abulafia CBE FBA	Prof David	To take away the light from a much loved building which is the oldest and most beautiful synagogue in the UK is an act of barbarism and desecration. The synagogue makes virtually no use of electric light in order to preserve the origins I unchanged interior as perfectly as possible. An earlier application with a similar impact has already been rejected and it is beyond impossible to understand why this application has reached this stage.	NO	Public Access website	15-May-24
24/00021/FULEIA	Jonas	Daniel	It is clear from the approach of the developers and their repeated applications that they mean to have their way regardless of the rights and wrongs, and expect to be able to beat all opposition down with the weight of money. The benefits they suggest are marginal at best, and no more than what would be considered normal elsewhere. Many of the claims about action they plan to take can be quietly discarded later with no downside to them. In short, they can speak in bad faith, with no fear of consequence. This undermines the fairness of the planning process. It is extremely clear that the synagogue would have its light obscured, and that this incredibly important building would suffer a further blow against its utility for those who live in the area and attend daytime services, as I do. I cannot imagine this being permitted next to a major church.	NO	Public Access website	15-May-24
24/00021/FULEIA	Garcia	Robyn	I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Goldin	Jon	I strongly object to this planning application which will have a detrimental impact on the Bevis Marks synagogue, which has huge historical significance.	NO	Public Access website	15-May-24
24/00021/FULEIA	Elia	Israel	Overshadowing the Synagogue and other buildings , blocking light, Changing the unique character of the area, which was preserved since 1701 With great struggle.	NO	Public Access website	15-May-24
24/00021/FULEIA	Gee	L	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	birnbaum	Laura	I am concerned this will impact adversely on the listed buildings	NO	Public Access	15-May-24
24/00021/FULEIA	da Mota	Leandro	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	15-May-24

24/00021/FULEIA	Ozer	David	Dear Sirs, You have resubmitted an earlier application which was rejected by making small changes and reducing two floors, in the hope that you will not be met with strong objections. This is not the case this time round either. I am a member of the Spanish & Portuguese Jewish Congregation and I strongly oppose your new application for a new tower. Your new development is not in keeping with the conservation area, and will totally diminish our Grade-1 listed building, the Bevis Marks Synagogue which is the most important Jewish site in the UK. The new tower, to the south of the synagogue will alter the setting of the synagogue, block out the southern sky view which is of utmost importance to my religion, over shadow the synagogue and its courtyard and pose a huge security risk exposing our members to any would be terrorist organisation who would be able to attack members at random from this building. In this awful time of heightened antisemitism, allowing such a building to overshadow the oldest synagogue in the country is a total travesty and must be stopped immediately. Such an application would not be allowed to go ahead within the vicinity of St Paul's Cathedral, Westminster Cathedral or any building of equal religious significance in the the UK and should certainly not be permitted to proceed just meters from the most important synagogue in the land, particularly with its sensitive exposure. I respectfully ask that you reject this application in the interest of decency and understanding of the sensitive nature and the fear that has gripped the Jewish people in this country now. I would be terrified to encourage my children and grandchildren to mull around the courtyard as I genuinely believe this building could be used as a back drop for a terrorist act in London. Thank you for reading my comments	NO	Public Access website	15-May-24
24/00021/FULEIA	Chazan	Marcos	The building will have an adverse impact on our synagogue which is a protected, grade 1 listed building. It will block the sunlight out synagogue benefits from. Thanks	NO	Public Access website	15-May-24
24/00021/FULEIA	Marks	Simon	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of the Spanish & Portuguese Jewish community and am disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, which has barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building. Especially since this is now also in a conservation area, and is the most important Jewish site in the UK. My wife's family were founder members of the synagogue and have been living in the UK for hundreds of years. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dawood	Cindy	This new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Salem	Mark	I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sinyor	Pamela	I am very concerned about the total overshadowing of Bevis Marks Synagogue. It is a wonderful site of interest to tourists and a beautiful synagogue for worshippers. It will be dwarfed by the proposed building and its light would be very adversely affected. It is now in a conservation area and surely should be preserved including its right to light? It the building goes ahead it feels like something the planning department would regret for centuries to come.	NO	Public Access website	15-May-24
24/00021/FULEIA	Lebrecht	Elbie	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Benaim	David	The area is already too condensed and the amenities will suffer as a result of the development	NO	Public Access	15-May-24
24/00021/FULEIA	Shapiro	Caroline	I want to object due to the impact this will have on Bevis Marks synagogue	NO	Public Access	15-May-24

24/00021/FULEIA	Sieff	Alison	Having attended a wedding at the Bevis Marks' Spanish & Portuguese Synagogue quite recently (end of March 2024) - I can firstly say what a beautiful building it is and therefore I felt compelled to write with my objections to the new application submitted (Ref: 24/00021/FULEIA). The synagogue is surrounded by modern structures and is therefore already very much overlooked and, as far as I can determine, the new proposal (which I understand was initially refused some 2 years ago) does not comply with the recently adopted Creechurch Conservation Area and is not at all in keeping with the conservation area. The Creechurch Conservation Area includes the Grade 1 Listed synagogue which happens to be a building of high significance to British Jewry, it being the oldest synagogue, dating back to 1701, and has been in continuous use on the site ever since then. The proposed new tower immediately to the south of the synagogue would dominate and overshadow the synagogue's location and, more importantly, will block out important southerly views of the sky and reduce remaining light within the courtyard and synagogue itself. A proposal of this kind would never be considered within the vicinity of another important place of worship in London, such as St Paul's Cathedral or Westminster Abbey, and should certainly not be allowed in such close proximity to this historic building. I would strongly urge that you refuse this new application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Masri	Danny	It is a shame that this will destroy a part of London's history which is slowly disappearing yet there is a vast amount of sky scrapers / high rise buildings so concentrated in a such small area as yhr City of London.	NO	Public Access website	15-May-24
24/00021/FULEIA	Rahamim	Marina	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	L	Matthew	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	15-May-24
24/00021/FULEIA	Stolerman	Suad		NO	Public Access	15-May-24
24/00021/FULEIA	Ashton	Martin	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). Why has the City considered this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area? This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. What is more, we don;t need another tall building in the vicinity - you can replace Bury House with a smaller, modern eco design that benefits everyone rather than build another environmentally monstrosity that makes a mockery of a conservation area from a religious building that is still in use and has an important role in British, if not World Jewry. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Perez	Lorna	This would totally overshadow a national treasure	NO	Public Access	15-May-24
24/00021/FULEIA	Ibgui	Simon	There is a special and historical synagogue located near the proposed building which will be heavily impacted by the proposed plans. The synagogue is a listed building with immense meaning, to my family and many other Jewish people in London. I find it very difficult to believe you would ever allow such a building to be built near any other religious site Bevis Marks synagogue should be granted the same protection. The building will block huge amounts of light from the synagogue. The natural light gives the synagogue its character and allows areas of the premises to be used for various celebrations. The moon plays an integral part of the Jewish calendar and sometimes even forms part of our services. The construction of the building will block the view of the moon from the synagogue and so will directly impact the ability for the community to perform these religious services from the synagogue building. (Additional information available here: https://www.chabad.org/library/article_cdo/aid/1904288/jewish/Kiddush-Levana-Sanctification-of-the-Moon.htm)	NO	Public Access website	15-May-24
24/00021/FULEIA	Kopaloff	Stephen	This building is part of the Jewish heritage of the UK, any change will be an enormous loss to the overall Jewish community	NO	Public Access website	15-May-24

24/00021/FULEIA	Rahamim	Joseph	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Eliasov	Dean	I am writing to formally object to the proposed development of a 45-storey tower adjacent to the synagogue located. The synagogue is a Grade 1 Listed building of immense historic and cultural significance, and I believe that the proposed development would have severe detrimental effects on its integrity and the surrounding area. I kindly request that you carefully consider the following points in your assessment of this planning application. 1. Overwhelming Impact: The proposed tower would completely overwhelm the synagogue, which holds significant historical and cultural value. It is perplexing that such a building would not be subject to the same level of protection as St. Paul's Cathedral. 2. Destruction of Southern Sky View: The development would obstruct the essential southern sky view, which plays a crucial role in the setting of the synagogue and contributes to religious rituals. The view of celestial bodies, including the moon's passage across the sky, would be obstructed, diminishing the intangible qualities associated with religious practices. 3. Inappropriate Location: While the proposed building may be well-designed and sustainable, it is simply in the wrong place. Its towering presence would cast shadows over the synagogue and its courtyard, significantly impacting the usability of the courtyard for rituals and celebrations. 4. Diminished Daylight: The development would further reduce the already minimal daylight that penetrates into the synagogue, making it even more challenging to conduct worship. Given the historic nature of the synagogue, installing additional electric lighting is not a feasible solution. 5. Conflict with Conservation Area Policy: The development site falls within the Creechurch Conservation Area, where current planning policy prohibits tall buildings. The proposed tower directly conflicts with the statutory development plan in place. There are many other points to raise but I have run out of characters.	NO	Public Access website	15-May-24
24/00021/FULEIA	Mesrie	Elizabeth	A building of the magnitude planned will completely overshadow & take all the natural light away from the Synagogue building which is a Heritage building. Being a member of the community, I totally object to the plans suggested.	NO	Public Access website	15-May-24
24/00021/FULEIA	Cohen	Samantha	I am very concerned about this proposal to build a 45 storey tower right next to the most significant Synagogue in the UK. Such a huge building would completely overwhelm the grade 1 listed building. It would cause irreparable harm to the Jewish community in London - a spectacularly upsetting thing to do at any time but especially so given the current outpouring of anti-semitism in London. Can you imagine what the response would be if someone were to propose such a tower be built next to St Paul's! It would almost completely block out the sky and contribute to the already beleaguered and oppressive nature of the courtyard there. The many celebrations which currently take place both in the courtyard and inside the building would become dour and dimly lit affairs - celebrants will go elsewhere, the synagogue will be used far less and eventually only the doughtiest souls will remain. I can hardly believe the City is even considering this proposal so patiently appalling is it.	NO	Public Access website	15-May-24
24/00021/FULEIA	Twena	Diane	Unsightly near grade 1 bevis marks . I am member. Take away light , similar to previous rejection proposal	NO	Public Access website	15-May-24
24/00021/FULEIA	Goodkind	Karen	Bevis Marks Synagogue is a Grade 1 Listed building of enormous historic and cultural significance. Erecting a 43 story building next to it would be devastating to Europe's oldest fully functioning and continuously used Synagogue. A building of this height will destroy the southern sky view which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The proposed building would overshadow the synagogue and its courtyard for much of the day, reducing the usability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. I therefore strongly object to the proposed re building of Bury House	NO	Public Access website	15-May-24
24/00021/FULEIA	gilbey	georgia	n/a	NO	Public Access	15-May-24
24/00021/FULEIA	sueke	john	My place of worship is BEVIS MARKS a Grade 1 listed building built in 1656 one of the world's most important and oldest places of worship of the Jewish faith . This disgraceful and thoughtless planning request would never even be considered in the immediate vicinity of St Paul's Cathedral, and should certainly not be permitted just a few metres from our synagogue , particularly along its sensitive southern exposure. I implore you to refuse this this new application as an affront to such an important place of worship and to our community many of who have been members and supporters for many generations	NO	Public Access website	15-May-24
24/00021/FULEIA	Kenley	Holly	A 45 storey tower would completely overwhelm the nearby synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection?	NO	Public Access website	15-May-24
24/00021/FULEIA	Sabbah Bensimon	Raymond	It's an outrage, a monstrosity to build a tower in this area so close to a historic building older the St Paul cathedral. Please stop this nonsense.	NO	Public Access website	15-May-24
24/00021/FULEIA	ANI	MICHAEL	I strongly oppose this application. Being a member of the Spanish & Portuguese Jewish community I am horrified to see this new proposal, following the refusal of a very similar proposal two years ago. This new application is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. It also falls within the new Creechurch Conservation Area. The new tower, to the synagogue's immediate south, would overwhelm the setting of the synagogue, blocking out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, diminishing any remaining natural light . This proposal should certainly not be permitted in the interests of preserving our most important historic sites within London. I urge you to refuse this application	NO	Public Access website	15-May-24
24/00021/FULEIA	Sabbah Bensimon	Raymond	It's an outrage, a monstrosity to build a tower in this area so close to a historic building older the St Paul cathedral. Please stop this nonsense.	NO	Public Access website	15-May-24

24/00021/FULEIA	Rahamim	Vivian	I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Aaron	Scott	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a former member of Bevis Marks congregation and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sasson	Laura	Bevis Marks is a synagogue of huge cultural and historical significance. It must be preserved and protected for future generations.	NO	Public Access website	15-May-24
24/00021/FULEIA	Delvalle	Arthur	This work would put areas of worship in an uncomfortable position as access to them will be reduced and noise pollution from construction would affect them during times of active worship.	NO	Public Access website	15-May-24
24/00021/FULEIA	Kos-Est	Alessia	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Foundation For	Jewish Heritage		N/A	Email (attached in DC- received by email file)	15-May-24
24/00021/FULEIA	Nunes Vaz	Joyce	Objecting to this proposal as a member of this synagogue. My husband's family have been members since the late 1880's and every generation since then have been married there. His father was minister of the congregation for over 20 years. This is a very special place and anything that interferes with it's ambience and quality of worship would be intolerable.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dawood	Richard	Nothing about this application addresses the serious impact the proposals have on the local environment, in particular the terrible impact it would have on Bevis Marks synagogue we occupies important place the heritage of the Jewish community in London and more widely in the UK. The strategy seems to be to wear everybody down with repeated applications of a similar nature. This is highly objectionable strategy and I would urge planners to robustly against this latest application all future variants of it. Previous applications have been rejected, and this one should fail also.	NO	Public Access website	15-May-24
24/00021/FULEIA	Schimmel	Noam	It is of great importance for the respect of Britain's cultural, historical, and religious heritage to ensure that values of preservation are upheld in protecting the Bevis Marks synagogue which is an integral and valued part of London and Britain's architectural and inter-communal patrimony. The new development application undermines respect for this unique heritage, disrespects the local Jewish community and violates fundamental principles of respect for diversity and shared heritage that contributes to the uniqueness of London and its vitality as a city that honors pluralism through policies and practices that protect the heritage of its residents and their distinctive histories. The new tower would block the synagogue and confine it, cutting it off from its natural setting and marring the experience of its members and visitors for whom it is a place of celebration, prayer, meditation, solace, sharing, and communal reflection and congregation. The quality of all those experiences would decline with the blocking of the southern sky view and the resulting dramatic reduction in natural light. I urge you to refuse this application and in so doing to affirm the value and significance of the Bevis Marks synagogue, its civic, cultural, spiritual, and communal significance, and respect for the history and heritage of what is one of Britain's most enduring structures and synagogues with a living historical presence that continues to make a dynamic contribution to contemporary British life and the religious, ethnic, and communal diversity that animates it.	NO	Public Access website	15-May-24
24/00021/FULEIA	Turner	Joanne	It would be a great shame to ruin this historic building	NO	Public Access	15-May-24
24/00021/FULEIA	Fhima	Simon	It is disgusting that the City of London are even considering allowing this plan to go ahead. Bevis Marks synagogue is the cultural heritage of the entire Jewish community of the UK and to threaten its status as a functioning synagogue by blocking off its natural light with this building shows a total disregard for the Jewish population and its history.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sopher	Edward	Bevis Marks synagogue is one of the true unsung jewels of the City of London in terms of serving as a living link to the 18th Century and its unique customs. It is a real draw for tourists and serves as a proud symbol of the historic ethos of the City as a mercantile center. The proposed plan would drastically change the approach to and the surrounds of the synagogue in a way that would make it seem small and irrelevant- effectively destroying the fabric of this beautiful part of London history.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dacosta	Bernice	The building will affect the light in the Synagogue as well as over shadowing it.. I have been a worshipper at Bevis Marks for many years and feel that the city's Jewish heritage should be protected.	NO	Public Access website	15-May-24
24/00021/FULEIA	Cowen	Anne	The proposed building deprives Bevis Marks of natural light and does not respect the historic significance of that building to the community and Anglo Jewry in general.	NO	Public Access website	15-May-24

24/00021/FULEIA	adler	sarah	Both the elected Mayor of the City of London as well as the Mayor for London and the prime Minister keep informing the Jewish community that the comunity adds to the vibrant diversity of London and is respected at all times. However,it would appear that commerce is far more appealing to the City rather than history and diversity. In 1492 my ancestors were forced to leave Spain and wandered through many countries and locations before finding a safe haven in the UK where we have worked hard to ensure that we make a worthwhile contribution to the entire area. Is it too much to ask that the first synagogue the community was permitted to erect in Bevis Marks should be treated with the respect both the building and the community deserve? The building itself is far more than a place of worship,it continues to tell the history of those early settlers and is a place of education for todays school children and students as well as tourists. An office block can be built at another location, it will not be intended to last the years that Bevis Marks has and will continue so please just take a step back and think what you are trying to destroy.	NO	Public Access website	15-May-24
24/00021/FULEIA	Hornstein	Rodney	The proposal fails to respect the immense heritage of the Bevis Marks Synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre. This project should not be permitted as it will ruin one of the most revered and historic areas in the City	NO	Public Access website	15-May-24
24/00021/FULEIA	Newman	Amanda	It is disappointing to see that this planning application for Bury House has only very minor changes from the one that was rejected previously. It is directly contravenes the Creechurch Conservation Area Plan specifically policy DM12.2. The new building proposal will cause significant damage to the Grade 1 listed Bevis Marks Synagogue and the Grade II* listed Holland House. The new proposed building will be overbearing to the Synagogue and completely dominate the skyline. The loss of significance in conservation and religious terms should be taken into consideration. The Synagogue is the only non Christian place of worship in the City of London. This proposed development is not only detrimental to the building but to the worship within the Synagogue as it will block out the religiously important southern sky. The light that comes in from this direction is an important part of the religious ceremony. The Synagogue is the Cathedral of Anglo Jewry and as such should be seen as significant as St Paul's Cathedral. I strongly object to this planning application	NO	Public Access website	15-May-24
24/00021/FULEIA	Golanski	Karen	I objected to the first proposal for a high rise development here and am hugely disappointed that another proposal has been submitted. My reasons for objecting to this one are effectively the same. it will be a blight on the area, in particular on Bevis Marks Synagogue which is of immense historical importance. The effect of a high building so close to it will cut out much of the light which will make religious services difficult. The City of London Corporation has surely made this a conservation area for a reason, so it is hard to see how such a development could be given the green light.	NO	Public Access website	15-May-24
24/00021/FULEIA	Hurst	Ann Stephanie	We need to preserve the historical buildings and the area should not be over developed with high rise buildings encouraging pollution, noise and crowded areas.	NO	Public Access website	15-May-24
24/00021/FULEIA	Rejwan	Salman	Hello, This proposed planning application is overbearing in that it doesn't take into consideration the significance of Bevis Marks as the ancestral home of the Sephardi congregation in the UK. It undeniably blocks the views and light over the southern end of the synagogue and I would like to strongly object to this application. I mean having a small building in a conservation area being dwarfed by a skyscraper is overbearing in the extreme.	NO	Public Access website	15-May-24
24/00021/FULEIA	JNatali	JNatali	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I strongly urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Turner	Jacob	There are innumerable places for the development of modern buildings in or around the City of London. There is just one Bevis Marks synagogue - a building of great historic importance, architectural merit, and religious significance - not just for the Jewish community but for the UK more widely. The light and aspect of Bevis Marks synagogue would be significantly damaged by the proposed development. Once that has been lost, it will never be recovered. Who breaks a butterfly on a wheel?	NO	Public Access website	15-May-24
24/00021/FULEIA	Speigel	Maureen	I just cannot believe in this day & age how London can put this building next to the Synagogue I was married in. Just considering the light alone it's will be overwhelming in its restriction. Bearing in mind the age of Bevis Marks you'll be ruining the present height to something completely out of keeping with the area. I sincerely hope this decision will be reconsidered.	NO	Public Access website	15-May-24
24/00021/FULEIA	Attan	Mark	I'm writing to express my strong opposition to this new application . I'm extremely disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower,to the synagogue's immediate south, would dominate the setting of the synagogue,block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposalwould never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's most historic synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Dias	Max	I have been associated with Bevis Marks and I was chorister since childhood. My life in Judaism has derived from the lessons I learned and my subsequent attachment with the synagogue and the order of service which I followed as a lay minister. I was married there and my family has followed the customs of the religious service. It has been a bulwark of Spanish and Portuguese Minhag since its inception in 1701 and a blessing to the Community..	NO	Public Access website	15-May-24

24/00021/FULEIA	Maya	Gaston	I am objecting on behalf of Latin American Sephardic Federation (310,000 members) We are concerned to see this new proposal, especially after the refusal of a very similar one just two years ago and the recent adoption of the Creechurch Conservation Area. The application is not in keeping with a Grade-1 listed place of worship. The seventeenth-century Bevis Marks Synagogue and its soon to open education center is the most important Jewish site in England and a jewel in the crown of world Jewish heritage and the Sephardi tradition. The proposed tower, to the immediate south, would block out the religiously important southern sky-view and completely overshadow the Synagogue and its courtyard, blocking all remaining light. We consider the planning application to be unacceptable and urge you to refuse it. Gaston Maya, President Mexico City, Mexico	NO	Public Access website	15-May-24
24/00021/FULEIA	Ward	Joanna	Bevis Marks synagogue is a "national treasure" - smaller than St. Paul's Cathedral but just as important in its own way. It's the oldest continuously occupied and used in the country. Allowing high rise buildings be built right next to it is totally unacceptable - they would overshadow it visually and more importantly would block the light from this delightful old building.	NO	Public Access website	15-May-24
24/00021/FULEIA	Gilmont	Jason	Not in keeping with the surrounding area. Adversly affecting the amenities of Bevis Marks	NO	Public Access website	15-May-24
24/00021/FULEIA	Garcia	Philip	I strongly object to this new application. I do not see how it could be possible to accept this new application given that something almost identical was refused two years ago. Also, a new Creechurch Conservation Area has been adopted in the meantime, which was supposed to rule out any such proposal being considered again.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sabbah	Nethali	Danger to Bevis Marks Histpric synagogue	NO	Public Access	15-May-24
24/00021/FULEIA	Gleen	Carmen	Light blocking. Blockage of Heritage site of significant historical and religious importance.	NO	Public Access	15-May-24
24/00021/FULEIA	Dale	Priscilla	To place a building of such height next to an historic building of such importance is insensitive of the character of the City of London and lacks architectural merit of any kind. Please refuse this application and restore faith in the long term architectural integrity of the City and it's planners.	NO	Public Access website	15-May-24
24/00021/FULEIA	Wood	Abigail	As a religious Jew who has prayed at Bevis Marks Synagogue and has attended events there, I am concerned about the planned 43-storey building which will overlook the synagogue and very substantially change the ability to use the building and its courtyard. Natural light is vital to the space, and the ability to see the sky and moon has meaning in Judaism for observing the religious calendar.	NO	Public Access website	15-May-24
24/00021/FULEIA	Smouha	Derrick	I would be grateful if you would kindly take into account, when arriving at your decision granting planning permission to the developers of the Bury Street site, that a positive decision would be the equivalent of a death sentence to the Bevis Marks synagogue, the oldest synagogue in constant use in England dating back hundreds of years. This building is of immense value to the Jewish Community, to the City of London and to the country as a whole as it provides a place of worship used without a break for centuries by the Jewish Community, it is a building of great historical and architectural value, and many people travel across the world to London to visit it. That said, if the requested permission were to be granted, contrary to the previous decision, the harm which would be caused to the Synagogue and to the age-old use of the building would be immense and irreparable. We therefore request you to look very favourably on our request and save this beautiful and historical building for future generations thus enabling its constant use to continue for many years to come. We thank you in advance.	NO	Public Access website	15-May-24
24/00021/FULEIA	Silver	Rachael	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application	NO	Public Access website	15-May-24
24/00021/FULEIA	Bard	Julia	The proposal fails to respect the important and highly sensitive history and heritage, as well as the beauty of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as on the Dangoor Heritage and Education Visitor Centre. How this proposal even reached this stage is difficult to understand.	NO	Public Access website	15-May-24
24/00021/FULEIA	Rubie	Michael	I am very disappointed that the future well-being of Bevis Marks synagogue, its congregation is once more under threat from an inappropriate development in its immediate vicinity. It is the oldest Sephardi synagogue in the UK, built in 1701. Quite apart from possible damage from building a 43 storey tower with 4 basement levels immediately adjacent (to say nothing of the other proposed structures in the development), such a large building will, I understand, substantially reduce available natural light to the building and will adversely aff	NO	Public Access website	15-May-24
24/00021/FULEIA	Wake-Walker	Richard	The proposal will negatively affect the fine, historic Synagogue to the detriment of the local community, visually, environmentally and physically. I object most strongly. R. Wake-Walker	NO	Public Access website	15-May-24
24/00021/FULEIA	Rubie	Michael	PLEASE ADD THIS TO MY EARLIER SUBMISSION AS I ACCIDENTALLY SUBMITTED IT BEFORE COMPLETING MY COMMENTS. The synagogue was built with candle light only and even now has very limited electric light. This development will affect its use as an active synagogue and as a much visited historic building. My own ancestors, Raphael and Esther Da Costa, escaped the Inquisition, as secret Jews in Portugal, and were married in Bevis Marks in 1746. My grandfather and his brothes were all congregants there. One must also wonder whether the intended development is really necessary in the City at this time.	NO	Public Access website	15-May-24
24/00021/FULEIA	Goldstein	Adele	I'm a supporter of Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK and the Heritage and Education Visitor Centre which is due to open later this year. The new tower, to the synagogue's immediate south, would dominate the protected setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. What message would permitting this obscenity send about the City of London and its values to the hundreds of thousands of visitors, including school children and those from across the UK and overseas, who will come to visit over the new few years? This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Bowman	Andrew	Loss of light and swamping of heritage. As someone who has worshipped there and also recognises its historical significance which transcends our Jewish community by forming a rare snapshot of how the City of London has evolved. Please don't let it be trampled upon. It's not as if there is a dearth of high-rise buildings in the City, very few of which will be fondly associated with cultural history the way Bevis Marks is. Please remember why you correctly rejected another application a few years ago exercising your role as a guardian of the heritage of the City.	NO	Public Access website	15-May-24

24/00021/FULEIA	Phillips	Keith	The proposal will block out natural daylight and impact the foundations of our beloved synagogue (place of worship). Our descendants were members of the synagogue and my daughter was married there in 2016 - it holds such a special place in our hearts and must be preserved at all costs. Please reject these development plans	NO	Public Access website	15-May-24
24/00021/FULEIA	Grossman	Seth	This proposal fails to respect the immense heritage of the synagogue site and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre. As a historically significant element of the Jewish community, I urge you to reject this application	NO	Public Access website	15-May-24
24/00021/FULEIA	Moss	Martin	This building is approved will interfere with the synagogue next to it. You would not allow such an eye saw next to at Paul's cathedral. Please do not approve this development.	NO	Public Access website	15-May-24
24/00021/FULEIA	Castiel	Gilah	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a member of Bevis Marks' Spanish & Portuguese Jewish community and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Ettinghausen	Daniel	As a member of the Community, I opposed this project as it will overlook and take light from the oldest Synagogue in the UK - itself a listed building. I thought the Common Council had agreed to an exclusion zone but this suggested building will breach that agreement.	NO	Public Access website	15-May-24
24/00021/FULEIA	shaoul	doreen	The placing of an enormous building of 43 stories up and four stories underground on the doorstep of this grade one listed religious building is most inappropriate. it will block the light and over power it so that it will fade into insignificance. This building is unique. It is our flag ship jewish building. It has hosted King Charles the third when Prince of Wales and Tony Blair when Prime Minister. The same families I've prayed here 4/300 years. During the day office workers in in the City Of London use it. It houses, unique, religious artifacts and it's Museum is a prominent part of Tours of London. It will be almost impossible to find it, lost like a needle in a haystack under the shadow of this huge building. please think again and you will realize that this is the wrong building in the wrong place, opher or perhaps the right building in the wrong place	NO	Public Access website	15-May-24
24/00021/FULEIA	Wassermann	Charlotte	I am objecting to this application on two main grounds which both relate to the impact of this proposed development on the Bevis Marks Synagogue and the general impact of this development on a conservation area in conflict with the development plan. Firstly, the development plan advocates for refusing tall buildings within the conservation area. The conservation area is historically important and unique. The building of inappropriately tall structures will cause irreparable harm and damage the character of the area. Secondly, the Bevis Marks Synagogue is a Grade I listed building of international importance and national importance. This development would lead to substantial harm to the setting of the building and the conservation area. For example, there would be significant overshadowing of the synagogue with most of its natural light removed. I live near to the synagogue and value the city of London for its ability to balance the needs of a modern global city with the preservation of its historic fabric which is an integral part of what makes this part of London so unique and special. Allowing this developing would be an unacceptable tipping of the balance in favour of short term commercial gain at the expense of the greater value to be found in the enduring heritage of our area.	NO	Public Access website	15-May-24
24/00021/FULEIA	Keiner	Judy (Celia Judith)	I strongly object to this proposal for a 40+ storey development which will greatly affect the light, particularly the south facing light, available to the Bevis Marks Synagogue, as well as the amenity of the synagogue's views and surroundings. The synagogue is the oldest still functioning non Christian place of worship in the UK, and is also a priceless architectural and cultural treasure for both the UK Jewish community and for the patrimony of the UK as a whole. Although an amenity space area has been designated near the synagogue, it is clearly grossly inadequate to the task of protecting the amenity of the synagogue, its visitors and members from being being overshadowed to the detriment of worship and other activities of this unique and beautiful treasure of British Jewry.	NO	Public Access website	15-May-24
24/00021/FULEIA	Wan	Elizabeth	In order for London to embrace it's exciting future, it must remain firmly grounded in it's proud historic roots. This includes cherishing historical buildings such as Bevis Marks synagogue. I was lucky enough to visit the synagogue as part of an Open House weekend; as the light shone in through the windows the building filled me with awe, and I learnt about an aspect of London I'd previously known nothing about. This is at risk with the building plans submitted	NO	Public Access website	15-May-24
24/00021/FULEIA	Guivarch	Johanna	I'm a member of Bevis Marks' Spanish & Portuguese Jewish community. This new proposal is offensively damaging the purpose and serene use and of Bevis Mark synagogue and such a project should not be tolerated in the Creechurch conservation area. Furthermore it is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure.	NO	Public Access website	15-May-24
24/00021/FULEIA	ZEHAVI	Leora	I object to the demolition of Bevis Marks Synagogue....it should be preserved as a Jewish heritage building particularly in the light of anti semetism in London and wider society.	NO	Public Access website	15-May-24
24/00021/FULEIA	Ashton	Paul	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm a regular congregant at Bevis Marks Synagogue and am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24

24/00021/FULEIA	Abery	Nic	A 45 storey tower would completely overwhelm a synagogue of personal and communal significance , which is a Grade 1 Listed . It is inconceivable that such a building would be allowed next to St Paul's cathedral ot other religious site, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. The synagogue has spent considerable money and time redesigning and developing the courtyard for educational and community events which would be impossible to utilise.	NO	Public Access website	15-May-24
24/00021/FULEIA	Bloch	Anna	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	15-May-24
24/00021/FULEIA	Eddy	Nathan	Bevis Marks is an historic synagogue of huge importance to the Jewish community. It will be adversely affected by this proposal. I care about the place of synagogues and all places of worship in the uk, we need to look after them as living places of worship.	NO	Public Access website	15-May-24
24/00021/FULEIA	Sidley	Deanna	The previous development was turned down in 2022. It would be an outrage to destroy the conservation area, especially with a place of worship, the Bevis Marks Synagogue, that was built in 1701 and is at least a decade older than St. Paul's Cathedral. The history and conservation of Bevis Marks is extremely important to the Jewish Community in the U.K., especially the Sephardi Community who built this synagogue when Jews were permitted once more to live in Great Britain and invited by Oliver Cromwell. These first returning Jews came here to seek refuge from the Spanish Inquisition. The Jewish people have contributed so much culture, intellectual ability, art etc. The erection of this building would destroy the uniqueness of the whole conservation area. This multi-storied monstrosity is not necessary and would be in the words of H.M. King Charles III, when he was the Prince of Wales, a carbuncle, and in my opinion will destroy the tranquility and special surrounding historic atmosphere . No to this development	NO	Public Access website	15-May-24
24/00021/FULEIA	Jammer	Leon	I believe this kind of development will cause interference in light availability in the neighbouring Bevis Marks synagogue, as well as cause unnecessary interference in a cultural London landmark. This kind of development changes the nature of the conservation zone and I worry that this scale of development is unfitting for this area. I strongly object to this development.	NO	Public Access website	15-May-24
24/00021/FULEIA	Blackshaw	Myer	Should such a plan be approved it will overshadow Bevis Marks that is one of the most important places of worship in not just the UK but the world. Although small in stature it is huge in its appeal to worshipers. The hemming in and overshadowing will completely destroy the ambience and beauty that currently create a perfect space in which to feel the spirituality of this space. Please do no destroy what generations of worshipers have created and protected for over 300 years.	NO	Public Access website	15-May-24
24/00021/FULEIA	BEN-NATHAN	Geoffrey	Fully support the erection of this barbarian monstrosity only provided planning permission be given for a similar outrage in equal proximity to St. Paul's Cathedral as this would be to Bevis Marks. You wouldn't dare!(Well, you probably would if you thought you could get away with it)	NO	Public Access website	15-May-24
24/00021/FULEIA	Cuby	Dahlia	Please take into consideration my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and I'm devastated to see this application has once again been proposed and so soon after its refusal a couple of years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this.	NO	Public Access website	15-May-24
24/00021/FULEIA	Schmetterling	Dori	This is an extraordinary application for a massive tower next to a historic, Grade 1 listed building known as Bevis Marks Synagogue , in the middle of the Creechurch Conservation Area. This is one of only 2 such listed synagogues in London and has been operating continuously since 1701, making it the oldest still-in-use synagogues in the UK and, indeed in Europe. Although I do not live near the synagogue, I have visited it a number of times. It is obvious that the proposed tower will destroy views of the building and have a ruinous effect on the conservation area. Daylight and a view of the sky will be severely reduced. Having read a number of submissions by the public and consultees, I can see that many objections on planning grounds have already been submitted; I agree with them, This application - not so different to a previous one - must be refused!	NO	Public Access website	15-May-24
24/00021/FULEIA	Arkush	Jonathan	A 43 storey building looming over the historic Bevis Marks synagogue dating from 1701 is highly inappropriate and objectionable. Bevis Marks is a gem with deep historical and aesthetic significance to the City of London, as well as to Britain's Jewish community. Its immediate surroundings call to be treated with sensitivity and restraint. The proposed development runs counter to this and I urge the local planning authority to refuse this and any similar application, as they have before.	NO	Public Access website	15-May-24
24/00021/FULEIA	Glaser	Robert	This a cultural site with historical meaning. It must remain.	NO	Public Access	16-May-24
24/00021/FULEIA	McKinstry	David	The proposal is utterly contrary to all local and national guidance on the protection of the setting of heritage assets, and I have no doubt your own conservation team has advised thus. By approving this your members would essentially be inviting a process of Judicial Review.	NO	Public Access website	16-May-24
24/00021/FULEIA	Hakim	Jonathan	I am writing to object due to the negative impact the proposed development will have on the Bevis Marks synagogue, where I got married and with which my family has been associated since arriving in the UK in the late nineteenth century. The proposed building will shroud the synagogue in darkness and destroy its historic character. Bevis marks is of critical importance not simply to the Jewish community but also to the history of London. The synagogue is the heart of a living community and its unique architecture will be overshadowed and its interior light destroyed if this development were to proceed.	NO	Public Access website	16-May-24

24/00021/FULEIA	Jackson	Adam	I began singing in the choir at Bevis Marks synagogue almost thirty five years ago, and am at least the fifth generation of my family to have cherished, nurtured, and now be passing on, the traditions of London's Spanish and Portuguese Jewish community. I am firmly opposed to the new application (24/00021/FULEIA) for this proposed building. Its location and scale just to the south of the 1701 synagogue would overwhelm a religiously important historic place of worship and its courtyard, overshadowing a quiet place of contemplation. Nobody would consider constructing such a building if it were to infringe on St Paul's Cathedral. Nobody should consider it here either, next to the UK's oldest synagogue, a Grade I listed building and a symbol of London's openness and the way this country has welcomed and valued its Jewish community as an essential and respected part of the national fabric of the United Kingdom. I urge you to reject the application.	NO	Public Access website	16-May-24
24/00021/FULEIA	richards	ivor	the development will adversly affect the whole ambience of a historic building at Bevis Marks. Why is this proposal any better than the onerefused in 2022?	NO	Public Access website	16-May-24
24/00021/FULEIA	Harris	Josh	As a local church leader, I object to this proposal because it involves direct and specific harms to the local Jewish community specifically, including restricting their freedom of worship by obscuring a key portion of the sky and reducing natural light levels to unsustainably low levels. I am proud to minister in the City of London, which we regard as an open, tolerant, civil place which hosts a diverse and international community. I am concerned that this development, if approved, will seriously undermine that reputation, at a moment when we should be particularly working to ensure the safety of the Jewish community. As Priest-in-Charge of St Katharine Cree, I am closely engaged with the local community in and around Bury Street including workers, residents, and those who access community services in our church. We have undertaken more than 1,000 face to face conversations with City workers in the last three years. In my view, the proposed community benefit of this development and the investment in Holland House is intangible and, on the basis of what has happened in similar developments, unlikely to be sustainable to operate - and seems to have required importing organisations with the offer of free space to give the impression of deep community engagement. There are few successful examples of this kind of space I know without an 'anchor institution' running them such as a church, major established charity like Toynbee Hall, or local authority. As someone with expertise in the local community's needs, I cannot see significant likely benefit from the plans to the workers and residents who we engage with in the existing local community. Our community was proud that the City has recently created a conservation area here, and we were looking forward to working with the City to celebrate this and to see how we can together enhance it.	NO	Public Access website	16-May-24
24/00021/FULEIA	Walker	Susan	Objection to the building of tower block being built next to this historic synagogue which will overshadow and block natural light from the building. I am in support of all the synagogues objections	NO	Public Access website	16-May-24
24/00021/FULEIA	Catignani	Sergio	I have attended and visited this synagogue several times when visiting and doing business in London. The project is cultural vandalism and should be stopped!	NO	Public Access website	16-May-24
24/00021/FULEIA	Sochall	Ingrid	This should not be allowed	NO	Public Access	16-May-24
24/00021/FULEIA	Joshua	Michael	I wish to object to the proposed application as it adversely affects the neighbouring properties and particularly Bevis Marks synagogue and should be refused on similar grounds to the previous planning applications which were refused.	NO	Public Access website	16-May-24
24/00021/FULEIA	Jolly	Andrew	Bevis Marks is unique not just in the UK, but in the whole Ashkenazi world!! Large buildings can be built anywhere but Bevis Marks built in 1701, cannot be overshadowed or damaged by surrounding developments now or ever, it is a Grade 1 building and should be respected as such!!	NO	Public Access website	16-May-24
24/00021/FULEIA	HOPKINS	PAUL	Bevis Marks Synagogue is a special part of the City of London and a key component in the story of the Jewish community in the capital. A large office building will shroud the building in darkness and destroy its historic character. It should not go ahead. Apologies I'm a day late - computer problems!	NO	Public Access website	16-May-24
24/00021/FULEIA	Freudenthal	Bernard	I wish to register my strong opposition to this new application (24/00021/FULEIA). I and my family are long connected with the London Spanish & Portuguese Jewish community, attending services in its synagogues and married under its authority. I am disappointed to see this new proposal, particularly after its refusal two years ago. This is particularly baffling given the recent adoption of the Creechurch Conservation Area. It should be clear that this new application (a resubmission?) is not in keeping with the conservation of a Grade-1 listed building - Bevis Marks Synagogue, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, and overshadow the synagogue and its courtyard, dwindling its remaining light. It would be an unfathomable act of neglect of London's and Britain's heritage to permit this construction at the foot of British Jewry's most significant heritage synagogue, particularly along its sensitive southern exposure. The importance of the City of London for commerce and modern life stems from its historical context and long heritage and tradition. I urge you to refuse this application which would imperil our society's future by destroying the living traditions of the past.	NO	Public Access website	16-May-24
24/00021/FULEIA	Natali	David	I write as a member of the Spanish & Portuguese Synagogue community which I support, where I visit and worship from time to time and which my family has supported for many generations since 1778 when my GGGG Grandfather was married there. Bevis Marks Synagogue is a very special place. It is the 'cathedral' synagogue of the Sephardi jewish population of the UK and it is the most important synagogue in London. Its place in the City of London has been well recognised for generations. If an enormous building were allowed to be built so close to the synagogue at 31-34 Bury St. it would cast a shadow over Bevis Marks such that it would forever be in relative darkness. This cannot be right. It would also negate the meaning and purpose of the Conservation Zone recently established to preserve the character of buildings in that area. Bevis Marks has been honoured in recent times with the presence of the Prime Minister, the Lord Mayor, the Chief Rabbi and many other dignitaries. HM The King has just been pleased to confirm that he will be retaining the Patronage of The Bevis Marks Synagogue Heritage Foundation. It simply cannot be right for a new commercial development to be allowed to overshadow this immensely important, historic and religious building. It would be like permitting tower blocks to be built around St Pauls (which, rightly, is in fact protected from near and even distant development). I object most strongly to this planning applicattion.	NO	Public Access website	16-May-24

24/00021/FULEIA	Pereira-Mendoza	David	31 BURY STREET Fallback template letter to City Corporation Please note it is much better if you object in your own words, but we realise you may not have time to do this. Hence you might wish to use the text below, preferably with some adjustment so it isn't just a "standard product". === I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application. === HOW TO SUBMIT YOUR VIEWS: Please go on the City Corporation's website: LINK Click on "Make a Comment" and say what you wish to say. Alternatively you could write to the case officer, Anna Tastsoglou, either at anna.tastsoglou@cityoflondon.gov.uk or at P.O. Box 270, Guildhall, London, EC2P 2EJ	NO	Public Access website	16-May-24
24/00021/FULEIA	Priddle	Stephen	Absurd to build in a recently created conservation area that was the product of careful thought. The same consideration should be given to this synagogue and its worshippers as to the City's churches.	NO	Public Access website	16-May-24
24/00021/FULEIA	Dreyfuss	Vera	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-May-24
24/00021/FULEIA	Bahar	Raquel	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm [a member of Bevis Marks' Spanish & Portuguese Jewish community and am] appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	16-May-24
24/00021/FULEIA	Roberts	Elaine	Bury House should NOT be demolished and the Jewish Community lose their heritage!	NO	Public Access	16-May-24
24/00021/FULEIA	Adler	Elias	Proposed development will Impact surrounding grade one listed building Bevis Marks synagogue of which I am an occasional worshipper attending on days when working in city of London.	NO	Public Access website	16-May-24
24/00021/FULEIA	Hart	Barbara	Don't destroy the Holly place by covering it up.	NO	Public Access	16-May-24
24/00021/FULEIA	Brown	Louise	Such an important religious building should not be literally overshadowed in this way.	NO	Public Access	16-May-24
24/00021/FULEIA	Goldsmith	Jonathan	This synagogue should not be any more overshadowed than it is already. We are fully aware of the current pressure on London's few remaining Jews from Islamic institutions and members of the current local and central governments and population! But being the ONLY Jewish house of worship within the Square Mile, this needs to be as protected as St Pauls and the other churches!	NO	Public Access website	16-May-24
24/00021/FULEIA	ISAAC	LORRAINE	This new proposal is shocking. Two years ago it was refused. The new application has not changed very much since the previous application. It is not compatible for a Grade-1 listed building. The Tower Block would dominate the synagogue, and limit the light entering through the windows. Judaism requires a sky-view for religious reasons, and that is important. I believe had such proposal been planned near to the iconic St Paul's Cathedral and Westminster Cathedral, it would be turned down. Therefore, I am shocked and surprised that such an application has been made without due consideration for the iconic Bevis Marks Synagogue. In conclusion, I would greatly appreciate that the application is refused. It is imperative that this refusal is final.	NO	Public Access website	16-May-24
24/00021/FULEIA	Chandler	Julie	Having lived in London for 22 years and knowing this building I object to yet another office building being built next to it. It seems like history is being erased in this country with no respect for most things. Please no building next to this wonderful historic synagogue	NO	Public Access website	17-May-24
24/00021/FULEIA	Kerbel	Sorrel	I object to the planning application of this bury street block On the grounds that it will be noisy Overwhelmthe site as it will be not be eco friendly to the oldest synagogue in the UK , honoured by Jamaica as being one day older than their heritage synagogue that is a showpiece for tourists . Bevis marks needs protection from this plan .	NO	Public Access website	17-May-24
24/00021/FULEIA	Kerbel	Sorrel	Please reject this over large planning application that will destroy the peace and tranquillity of the Nevis marks synagogue - fine heritage building .	NO	Public Access website	17-May-24
24/00021/FULEIA	Juggler Crook	Lauren	Disgrace this is considering going ahead & I completely object. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. It is a listed building & treated as such.	NO	Public Access website	17-May-24
24/00021/FULEIA	Ben hur	Sharon	This historical building stands for hundreds of years. Now you are choosing to take away this historical site Despite having empty properties closeby	NO	Public Access website	17-May-24
24/00021/FULEIA	Yuchetel	Richard	This is an historically important building. One of the oldest communities in the UK.	NO	Public Access	17-May-24
24/00021/FULEIA	Oyawale	Agnita	Revised Marks synagogue must be protected for future generations. The access to light must be maintained. At this time Jewish people and the oldest Jewish place of worship must be maintained and supported. The government should not be so short sighted	NO	Public Access website	17-May-24

24/00021/FULEIA	Wiseman	David	My objection relates to the impact of this proposed development on the nearby Bevis Marks synagogue. I've had the privilege of attending Bevis Marks - a precious and unique synagogue. It is a special building, of importance not only to the Jewish community but also to London, and it must be prioritised over the short-term objectives of The City Corporation and developers. This does not only mean preserving the bricks and mortar of the synagogue, but also the space around it and the passage of light that flows through its courtyard and windows. The space and light are essential parts of the sanctity of this important landmark that will continue to be in active use for many generations to come. Developments that overlook the synagogue, especially the southern side, should not be considered.	NO	Public Access website	17-May-24
24/00021/FULEIA	Wilkinson	Guy	Nevis Marks synagogue is an outstanding Jewish place of worship and a most important historic building. In this time of rising anti semitism nothing should be done to diminish Jewish places of worship. This proposed building will dominate and overshadow Bevis Marks to its major detriment	NO	Public Access website	17-May-24
24/00021/FULEIA	Bear	Michael		N/A	Email (attached in DC- received by email file)	17-May-24
24/00021/FULEIA	Davies	Beryl	My husband and I,both Christian, visited the Bevis Mark's Synagogue several years ago. We were very interested in the history of unique place of worship,and we appreciated the guided tour of the building, together with a brief outline of the history of it's congregation. Surely, the city of London should be thankful for it's rich history, embodied in beautiful and sacred buildings such as this.Building more and more very high-rise blocks which threaten the character of historic treasures ,is not only destructive but positively foolish.I urge the City of London to reject permission for this unwise plan.	NO	Public Access website	17-May-24
24/00021/FULEIA	Beradida	Micol		N/A	Email (attached in DC- received by email file)	17-May-24
24/00021/FULEIA	L sner	Susan	It is a very significant place of worship in the city of London and has stood for centuries. There are several places of worship of other denominations that too are in the "wrong"place "	NO	Public Access website	17-May-24
24/00021/FULEIA	Straus	Martin	I am Deputy Mayor of Taunton Town Council & familiar with planning applications. I am Jewish & visited Bevis Marls Synagogue for a service in my teens, some 60 years ago and the unique atmosphere in this iconic building is still clear in my memory. It would be a major tragedy if the light within the building were to be adversely affected by the proposed tower. We are proud in South West England of surviving Synagogues in Plymouth (the second oldest in the UK) and Exeter (the third oldest) dating back some 270 years but Bevis Marks holds the distinction of being over 300 years old. It is absolutely vital that this planning application is rejected.	NO	Public Access website	18-May-24
24/00021/FULEIA	Cave	John Nigel	non-preservation of old buildings	NO	Public Access	18-May-24
24/00021/FULEIA	Rozas	Simon	I work near the building. Most City workers do not realise the historical and current importance of the adjacent synagogue to European history of the Jews, particularly the refugees from Spain and Portugal. It is similar in importance to the Portuguese synagogue in Amsterdam or the Altneu in Prague. No planning authority would even consider putting a high rise near those buildings, or near St Paul's cathedral, St Peter's or Agia Sophia. No social remedies, cafes or restoring other buildings could fix the damage done to the synagogue surroundings. The house relies on already scarce natural light and blocking it off completely with high rises makes it look like a relic rather than the living historical building in its surroundings. Allowing this to proceed would be an awful signal to the community and do irreparable damage to the site.	NO	Public Access website	18-May-24
24/00021/FULEIA	Whitear	Nick	Firstly the overshadowing of the Bevis Marks synagogue by this building would be an unacceptable degradation of that building and its historically and socially significant role in the City and wider locality. But also the impact on Becis Marks itself which is too narrow to permit a reasonable amount of light and air to the street when flanked by buildings of this size. Finally Holland House is another architecturally valuable asset from the City of previous centuries which should be left as undisturbed as possible.	NO	Public Access website	18-May-24
24/00021/FULEIA	Roberts	David	I wish to adopt the following: 'The current proposal comes just months after the Creechurch Conservation Area was designated in January 2024, covering the application site. The new proposals would demolish Bury House, at 31 Bury Street, and erect a building nine times its size. This would be a vast and overwhelming step up in scale and would run counter to the City of London's own planning policy which states that tall buildings are inappropriate within conservation areas. SAVE has submitted a detailed letter of objection setting out the damage the proposals would cause to the synagogue, its setting and the wider conservation area. We consider that the proposed 43-storey tower, which would be visible from within the synagogue's courtyard, would have a direct and substantially harmful impact on its setting and secluded nature. The sky view from the courtyard has religious importance and allows daylight into the synagogue's beautiful interior. This was a reason for the refusal of a previous tower proposal. SAVE also expressed strong concerns about the harm a building of this height would cause to the adjoining grade II*-listed Holland House, with its spectacular glazed bricks and mosaics, and unlisted 1912 Renown House, for which rooftop extensions are also proposed. A building of this scale would cast a shadow over multiple highly listed buildings within the Creechurch Conservation Area, including the, 17th-century St Katherine Cree Church and 18th-century St Botolph's, both grade I listed and located at its heart.'	NO	Public Access website	18-May-24
24/00021/FULEIA	Segall	Marilyn	I am a member of the S&P Sephardi Congregation and worship at Bevis Marks Synagogue. I wish to object most strongly to the proposed Bury Street development, which would completely overshadow Britain's oldest synagogue still standing, which dates back to 1701 and is a Grade 1 Listed Building, situated in a Conservation Area. To allow such a tower block to be built would be an act of total sacrilege.	NO	Public Access website	18-May-24
24/00021/FULEIA	Hasson	Steven	Apart from all the numerous planning violations already listed by others. I strongly object on the grounds of the negative impact this will have on a historic place of worship. As a Sephardic Jew in the U.K. this synagogue is the bedrock of the community. I will often commute from Cheshire to attend services in this historic building. Please don't impact its ambience. Would you consider a 43 story building immediately next to St Paul's? I would hope not!	NO	Public Access website	19-May-24
24/00021/FULEIA	Morgan	Susan	Bevis Marks has been a part of London Heritage since the 1700's and interfering in the worship by blocking the views, detracting from the exterior aesthetics of a conservative building and just generally having no concerns for the heritage of London is not acceptable. Far too often do developers push unwanted change on communities, not this time leave this site in view,stop blocking the light.	NO	Public Access website	19-May-24
24/00021/FULEIA	Myers	Sidney	I believe that allowing the construction of such a large tower block would completely overwhelm this beautiful and historic synagogue. It is utterly inconceivable that such a building would be allowed, for example, next to St Paul's Cathedral or Westminster Abbey. In my submission, this Grade I listed building should be afforded the same degree of protection. I strongly object to the proposed building and urge the planning committee to reject the application.	NO	Public Access website	19-May-24

24/00021/FULEIA	Beral	Mike	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I am a trustee of a Greater London synagogue and chair of a Jewish charity. I am disgusted to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral and oldest synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	19-May-24
24/00021/FULEIA	Somekh	Natalie	Bevis Marks synagogue is a unique site that holds huge historical significance for the Jewish community in the UK. This building proposal very clearly compromises the site, and it is completely inappropriate for it to be allowed to do so.	NO	Public Access website	19-May-24
24/00021/FULEIA	Mann	Deborah	Totally out of character with this culturally and faith significant building. Plans disproportionate in scale and fails to take into account Gem of history	NO	Public Access website	19-May-24
24/00021/FULEIA	Cowan	David	Location of sky scraper so close to historic synagogue	NO	Public Access	20-May-24
24/00021/FULEIA	Schiller	Michael		N/A	Email (attached in DC- received by email file)	20-May-24
24/00021/FULEIA	Gelbier	Stanley		N/A	Email (attached in DC- received by email file)	20-May-24
24/00021/FULEIA	Brent	Janice		N/A	Email (attached in DC- received by email file)	20-May-24
24/00021/FULEIA	Osen	Elana	The proposal fails to respect the immense heritage of Bevis Marks Synagogue and would have a disastrous impact on Bevis Marks Synagogue as a living Jewish congregation, as well as the Dangoor Heritage and Education Visitor Centre. The synagogue is the oldest in Britain and the flagship synagogue of the Spanish & Portuguese Sephardi population of the UK.	NO	Public Access website	20-May-24
24/00021/FULEIA	Fox	Julie		N/A	Email (attached in DC- received by email file)	20-May-24
24/00021/FULEIA	Jacobs	Tony	This is nonsense there are enough empty offices in the city already. This is a historic building and one that belongs to the oldest minority group of this city. What will the city gain from development save greater taxation. The city is already destroying the atmosphere of the area having pedestrianized much of it. This will be another nail in the coffin. It is London not manhattan	NO	Public Access website	20-May-24
24/00021/FULEIA	Van Straten	Craig	Right to light issues for Bevis Marks Synagogue.	NO	Public Access	21-May-24
24/00021/FULEIA	Pinto	Ruby	The proposed development is not in keeping with the current buildings. The new tower block will obstruct natural light to the surrounding area. Natural light is essential for humans especially during the autumn and winter months	NO	Public Access website	21-May-24
24/00021/FULEIA	Arden	David	The destruction of historic sites across London has been allowed to continue over decades under the banner of 'progress' but this area represents the last bastion of 350 years of Jewish history. The surrounding area must be protected to protect the integrity of the building and to ensure it continues as a place of worship unhindered.	NO	Public Access website	21-May-24
24/00021/FULEIA	Adam	Ralph		N/A	Email (attached in DC- received by email file)	21-May-24
24/00021/FULEIA	Hojsteen	Architect Aharon	In first the demolition and high rise construction is clearly an unsustainable environmental nuisance for the surrounding buildings, including them a historical synagogue a genuine landmark in British Jewry heritage. After the long and disturbing construction process, the tower will block out all daylight and and obtrude any sky view from the ancient synagogue, which is essential to its function. I pray you sincerely take these consideration close in order to preserve a heritage site. Thank you in advance.	NO	Public Access website	21-May-24
24/00021/FULEIA	Amal	Ruti	I am attending Bevis Marks synagogue. I don't want such a tall building to destroy the views around and the light that comes to light the interior of this historical religious building. Regards, Ruti Amal	NO	Public Access website	21-May-24
24/00021/FULEIA	Storey	Nicholas	The nearby Gradev1 listec synagogue needs light to maintain its atmosphere and spiritual character. Do not overshsdow it with yet another grotesque skyscraper.	NO	Public Access website	21-May-24
24/00021/FULEIA	Amar	Janine	It is THE oldest synagogue in England and still in everyday use. It is older than St. Paul's cathedral. As an attending and practising Jew, I find the idea that you would destroy it abhorent. Would you do this to St. Paul's?. Stop trying to erase our history in this country.	NO	Public Access website	21-May-24
24/00021/FULEIA	Main	Kathryn	Not in keeping with surrounding environment. Failure to consider neighbourhood historic environment	NO	Public Access website	21-May-24
24/00021/FULEIA	Blasebalk	Tony	Heritage and history... 300 years continuous worship is valuable and an example to other.	NO	Public Access	21-May-24
24/00021/FULEIA	Litwin	Holly	This proposed high rise building would dwarf and damage the Bevis Marks Synagogue and block all light from entering the synagogue. As the oldest continually used synagogue in the world Bevis Marks needs to be preserved and not damaged. As a Jewish tourist visiting Bevis Marks was the highlight of my trip to London.	NO	Public Access website	21-May-24
24/00021/FULEIA	Seaford	William	I object to the proposed new building adjacent to the synagogue. Please consider the affects of light and noise on the historical synagogue. Please consider the potential to use nearby empty office spaces. Enable the listed building to remain a hub for a community. Consider its unique history within European synagogues. Allowing continuity of worship over many years in the past and potentially in the future. When in the past such buildings have been destroyed in Europe. This building and its surroundings should be cherished. Consider such buildings as a hub in our country. In some ways representing the diversity in Great Britain and standing against the concrete uniformity of other cities. My support to the community and the synagogue. And my hope that decision makers open their minds to this .And other perspectives which support the building and its surrounding area. William Seaford	NO	Public Access website	21-May-24
24/00021/FULEIA	Malins	Leo		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Mautner	Roger		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Findlay	Katherine		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Halfon	Daniel		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Klionsky	Naomi		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Roodyn	Michael		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Mourtzilas	George-Michael		N/A	Email (attached in DC- received by email file)	22-May-24

24/00021/FULEIA	Berman	Gerald		N/A	Email (attached in DC- received by email file)	22-May-24
24/00021/FULEIA	Weiner	Estelle	It is totally inappropriate in relation to the historic area and long standing antiquity inherent in this site. The daylight would be affected. The view from the courtyard will be severely compromised. There is no real need for a building on the scale of that in planning; the existing building could be adequately updated without the overall size being so extensive.	NO	Public Access website	22-May-24
24/00021/FULEIA	Frost	Adele	It will change the environment surrounding the need for light in a building first established in the 17th century. It has personal connections for my family and anything that is detrimental to its religious character is not good. There is limited space already and any more overshadowing of this historic building is abhorrent.	NO	Public Access website	23-May-24
24/00021/FULEIA	Szlesinger	Brenda	Considering the recent designation of the Creechurch Conservation Area, it is perplexing that this application is once again before the Committee. The current scheme remains virtually unchanged from the previously rejected proposal. It fails to respect the conservation needs of a Grade I listed building located within a conservation area. Bevis Marks Synagogue is a cornerstone of Anglo-Jewish heritage. The scheme being proposed would have a material adverse impact on the setting of this important heritage asset. It will obstruct the religiously significant southern sky-view and cast a shadow over the synagogue and its courtyard, thereby depriving it of much-needed natural light. Such a proposal would never be entertained in proximity to St. Paul's Cathedral and should certainly not be permitted just meters from British Jewry's "Cathedral synagogue," particularly given its sensitive southern exposure. I urge the planning officers and the Members of the Corporation to REJECT this scheme.	NO	Public Access website	23-May-24
24/00021/FULEIA	Rodrigues Pereira	Nachshon	I object to this project because it takes away a significant part of daylight from the Bevis Marks Synagogue. The sunlight is an essential part of the character of this oldest synagogue in the UK and it would be a monumental blow and monumental mistake to take this away. Please protect this incredible and unique piece of British heritage and do not let any tower block any more sunlight of this synagogue. This is not only important for the congregants and for the UK, but Jews all over the world feel connected to this cause. Please!	NO	Public Access website	23-May-24
24/00021/FULEIA	Filer	Wendy	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). I'm an academic specialising in the legal history of Bevis Marks's Spanish & Portuguese Jewish community, the UK's oldest Jewish community. The Grade I listed Bevis Marks synagogue site is of incalculable value to the UK's rich historical story of religious and cultural minorities. The new planning application barely changes the original rejected proposal. The proposed building height irreversibly impacts the religious use of the synagogue, where electric lighting cannot be installed; shadows the courtyard preventing religious use and blocks the southern sky view necessary for religious ritual. Such irreversible, detrimental impacts on this historic site within the Creechurch Conservation Area cannot be mitigated by the Developers' weak arguments to support supposed benefits of their proposed scheme. Their arguments apply to all commercial buildings and are not unique mitigations addressing the irreparable harm to this historic site. They would be quickly dismissed if made in relation to St Paul's Cathedral, in relation to which Bevis Marks is the Jewish community's historical equivalent. Moreover it is environmentally indefensible to replace an existing building, which can be refurbished, with a new building. Bevis Marks's history is inextricably interwoven with that of the City Corporation and it is the duty of the Corporation robustly to defend its statutory development plan, to protect Bevis Marks as a working, vibrant building and community within the Creechurch Conservation Area. I urge the Corporation to reject this new application.	NO	Public Access website	23-May-24
24/00021/FULEIA	Reeve	Yvonne	This proposal is riding roughshod over God's chosen people. It denies their religious freedom.	NO	Public Access	24-May-24
24/00021/FULEIA	Evans	Nicholas	This proposal would be detrimental to one of the oldest synagogues in the UK and Anglophone world. The City of London has a proud tradition of preserving spaces of world class cultural importance- Bevis Marks now needs thus support.	NO	Public Access website	24-May-24
24/00021/FULEIA	King	Norman	This building needs to be protected from all aspects of intrusion and spoiling. It is one of the most important houses of worship in London. It is at this time of war in the middle east that London must show respect to the Jewish community.	NO	Public Access website	24-May-24
24/00021/FULEIA	Grossman	Jenni	It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place.	NO	Public Access website	24-May-24
24/00021/FULEIA	O?Shea	Elaine	This is a historic building and in London we have lost so much of our past that we should've saved or kept. I object very strongly to losing another building because developers want to make money. I say no to losing this building too redevelopment.	NO	Public Access website	25-May-24
24/00021/FULEIA	Papouchado	Elliot	Inappropriate structure alongside a historic place of worship.	NO	Public Access	25-May-24
24/00021/FULEIA	Goldberg	Ivor	The new building would overshadow a historic building, blocking light necessary for the continual function of the oldest functioning synagogue in the country. The building needs to be preserved.	NO	Public Access website	25-May-24
24/00021/FULEIA	Hanks	John	This development is detrimental to the setting of Bevis Marks Synagogue (Grade I listed) and will adversely affect the community that has worshipped there since 1701.	NO	Public Access website	25-May-24
24/00021/FULEIA	Cohen	Jonathan	A 43-storey building looming over the historic Bevis Marks synagogue dating from 1701 is highly inappropriate and objectionable. Bevis Marks is an architectural and historical gem, important both as Britain's oldest synagogue in continuous use and also a symbol of Britain's Jewish community. Its immediate surroundings must be treated with sensitivity and restraint. The proposed development runs counter to this and I urge the local planning authority to refuse this and any similar application, as they have before.	NO	Public Access website	25-May-24
24/00021/FULEIA	Burg	Jonathan	Very concerned this development will obstruct the proper operation of Bevis Marks Synagogue which requires access to sky for light for worship, including the weekly end of Sabbath (to see the stars) and monthly new moon, and the morning shadows caused by the new building making the sanctuary nearly unusable. Its not appropriate to build such a collosal structure in close proximity, potentially also damaging Bevis Marks ability to provide residential space for its porter or rabbi. The blockage of the Bevis Marks sanctuary would then result in a diminution of the City's history and diversity with over 300 years as an uninterrupted place of worship. The plans should be amended to ensure neither darkening nor damage to the Bevis Marks sanctuary by reflection/sunlight from glass in the new building. If necessary it should be designed around or the building set back to permit continuous light for Bevis Marks. Additionally the noise of visitors, retail and commercial ventilation exhausts and other HVAC will destroy the tranquility of the area especially at weekends, where quiet spots are rare to come by indeed, and those the City has, like Bevis Marks Synagogue, must be preserved.	NO	Public Access website	26-May-24
24/00021/FULEIA	Gilbert	Richard	To allow this proposed development would amount to environmental vandalism of what should be a world heritage site. Bevis Marks is a unique landmark that has been in consistent and daily for over 300 years. The proposed development could harm the fabric of the synagogue and jeopardise its amenities and ambience. Some developments do more harm than good and this would be one of them.	NO	Public Access website	26-May-24
24/00021/FULEIA	Marks	June	Don't spoil this beautiful and very special building which should be preserved for posterity	NO	Public Access	26-May-24
24/00021/FULEIA	Marnham	Andrew	Disrespectful	NO	Public Access	26-May-24
24/00021/FULEIA	Sepulveda	Elishevah	To disturb the spiritual ambiance with environmental factors such as overshadowing, increased traffic noise, foot traffic, building clamor and debris would be so very wrong.	NO	Public Access website	27-May-24
24/00021/FULEIA	Gocman	Michael	It would be detrimental	NO	Public Access	27-May-24
24/00021/FULEIA	Needham	William	The nearby Synagoge has been there for more than 300 years and is not only an historic cultural treasure, but also a living one. The blockage of natural like would severely compromise the integrity and functioning of this living legacy and give the wrong message about how we value our cultural heritage.	NO	Public Access website	27-May-24
24/00021/FULEIA	Fairbairn	Barrie	It seems to me that the benefits of the development to the developer are disproportionately small to the significant losses incurred by the Synagogue should the application be approved.	NO	Public Access website	28-May-24

24/00021/FULEIA	Judah	Jonny	I object to this and previously objected to a similar application	NO	Public Access	28-May-24
24/00021/FULEIA	Johnson	Colin	For a tower block to be built and allowed to overshadow next to such a Beautiful Religious Building is a Desecration of the Building and an insult to all who worship there. The fact that it has held religious services and stood there for over 300 years and is grade 1 listed says something about the Building. You would not build a tower block next to Saint Paul's Cathedral so why allow this ?	NO	Public Access website	28-May-24
24/00021/FULEIA	Hales	Allan	This is the greatest symbol of my heritage in the UK as a Sefardi. It's means more widely the post-Cromwellian readmission of Jews into England. It's cultural, architectural and historic significance cannot be overlooked. Sefardi Jews such as Montefiore, Sassoon, Henriques, Toledano, Navarro, Caro, Sebag and Serota. We've given much and asked for nothing. Please don't return us to the shadows like we don't matter	NO	Public Access website	28-May-24
24/00021/FULEIA	Mendoza	David		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Ehrlich	Daniel		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Rafaeli	Barbara		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Roback	Deborah		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Leigh	Lord		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Edwards	L Joan		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Bear	Michael		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Rothman	Gerald		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Sloam	Nigel		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Morganstein	Louise		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Eskenzi	Anthony N		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Rowland	Jon		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Lincoln	Francesca Raphael		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Gordon	Mark		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Jacobus	Laura		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Dimoldenberg	Paul		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Jorgensen	Reverend Laura		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Brennan	Clare M		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Callaghan SJ	Brendan		N/A	Email (attached in DC- received by email file)	29-May-24
24/00021/FULEIA	Cherry	Brigid	The proposed building will ruin the setting of the Bevis Marks synagogue - an historically and culturally significant listed building, depriving it of light and ambiance of a important religious building which means much to the community of Jews throughout the UK.	NO	Public Access website	29-May-24
24/00021/FULEIA	Parkes	Henrietta	Respect for an historical important building and place of worship, older than St Paul's Cathedral and a place that the Jewish community has as a symbol of their fleeing from the Inquisition to safety in London. This wouldn't be allowed to happen next to St Paul's or Westminster Abbey, why is it even being considered to allowed to be here?	NO	Public Access website	29-May-24
24/00021/FULEIA	Ruben	Caroline	The proposed Tower would be totally out of character in the area and will completely overshadow the Synagogue. It will shut out the light necessary to part of the Synagogue's services. The Synagogue is an historical building and any building particularly such a tall one would totally detract from the history of London.	NO	Public Access website	29-May-24
24/00021/FULEIA	Barkway	Janet	Why destroy this heritage for generations to come . Why can we not be proud to be the custodians of such heritage that has Been left to us to care for . We have in London and elsewhere plenty of modernism This is history for years to come to cherish and teach to our future families Don't let lour future children think badly of us for destroying an icon what on earth will they think of us .... A generation who did not care	NO	Public Access website	30-May-24
24/00021/FULEIA	Stern	Sharon	I am writing to object to the proposal which will result in a building that will overshadow Bevis Marks Synagogue, which is a Grade 1 listed building. There are too many high rises and empty buildings in the area as it is. Please do not destroy yet another area which has religious significance to a lot of people.	NO	Public Access website	30-May-24

24/00021/FULEIA	Birrell	Stephen	It is about time this site gets developed to it's fullest potential. This has been delayed for so long and for no reason. The design has been well thought out and is of a high quality design. The architects should be very pleased with this. I understand that the (Bevis Marks) Conservation Area is now a material planning consideration but the supporting documents have clearly considered this alongside any potential impacts on surrounding properties, including that of the synagogue. That organisation uses their seven chandeliers (representing days of the week) all the time to light the interior space. The synagogue even uses the chandelier as its logo, hence they are nearly always turned on to light the space. Having one extra tower nearby will not make a noticeable difference, which I'm sure the Daylighting Assessment has taken account of. That site is already surrounded by buildings and purposefully hidden from public view anyway, except when viewed down the narrow passage of Heneage Lane but that elevation is not affected by the proposed development. I hope that the politics surrounding this site do not prevent further development which this City desperately needs to stay in competition with the other cities of the world. It would be a shame if it were refused simply because one organisation has contacted a worldwide network that have not even been to the site. London is a great city and the juxtaposition of the old and new fascinates one and all, keep up the good work town planners in the Corporation and approve this application.	NO	Public Access website	30-May-24
24/00021/FULEIA	Kaufmann	Aviva	This will block the light to one of the most important religious and historic buildings in London. Bevis Marks is part of the fabric of London and this would be an absolute travesty. I am in disbelief that this is actually being considered seriously. Where are the adults in the room? Just shocking.	NO	Public Access website	30-May-24
24/00021/FULEIA	Eirew	Gabrielle	I write this my letter to you, London. You are a magnificent city full of gems of one kind or other. But the care please because in Bevis Marks you have a jewel especially of the British and Sephardi Jewish people and a jewel of what it looks like and stands for. Bevis Marks signalled the return of the Jewish people to London after their Medieval expulsion. Not only is it communally and architecturally significant but it is emotionally important as a symbol of integrity and perseverance . It has beautiful light figuratively and actually and the proposed buildings risks destroying and reducing that light. The proposed buildings will make it much lesser than it is - like the Crown Jewels , the jewel of Bevis Marks needs protecting properly please Shine on Bevis Marks, London!. Thank you.	NO	Public Access website	30-May-24
24/00021/FULEIA	Baum	Colin		N/A	Email (attached in DC- received by email file)	30-May-24
24/00021/FULEIA	Samuels	Adrian	This 300 year old example of Jewish heritage deserves to be respected. Building very tall skyscrapers adjacent to it makes no sense.	NO	Public Access website	30-May-24
24/00021/FULEIA	Kielty	Pauline	Every one has the right to light no matter who they are. To demolish this building is insane, it is a historical building. We are loosing to many of our historical buildings in this country to these logo type buildings which will not last as long as these precious buildings Pauline Kielty	NO	Public Access website	31-May-24
24/00021/FULEIA	Royo Moreno	Luis J	A listed building is more than the building itself: it is the landscape around it, because otherwise we miss the context and part of its history with it. That new building will not only spoil the historical context of Bevis Marks Synagogue, it can even become at one point a target for terrorism aiming to hit the beating heart of the Jewish community in London.	NO	Public Access website	31-May-24
24/00021/FULEIA	Applegate	Sharon	How dare you demolish this building ! What you want it for anther mosque anti semitism	NO	Public Access	31-May-24
24/00021/FULEIA	Booth	Judith	This building was built in 1701 and is important for Jewish heritage and deserves to be respected. Building a very tall skyscrapers adjacent to it makes no sense. It will block the natural light from the building and leave it in perpetual darkness.	NO	Public Access website	01-Jun-24
24/00021/FULEIA	Richardson	Will	The idea of allowing such a tall structure to overshadow the Bevis Marks synagogue is grotesque. We already have several old buildings (often places of worship) overshadowed in the City by modern tall buildings. I don't object to high-rise buildings per se, but we must look after our architectural heritage, and site them where they don't change the character of an important building.	NO	Public Access website	01-Jun-24
24/00021/FULEIA	Cable	Rory	This sounds like part of the coordinated attack on the Jewish community, we must look after all communities and preserve their rights and dignity and history.	NO	Public Access website	02-Jun-24
24/00021/FULEIA	Shahrabani	Ihsan or Eliyahu	I always prayed at Bevis Marks when I was living in the east end of London. Sometimes I participated in the prayers on Saturdays and weekdays. Local people and members remember me cycling from N16 to EC3A Sometimes 6 days a week.	NO	Public Access website	02-Jun-24
24/00021/FULEIA	Viana de Oliveira	Sezefredo	- A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. - It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? - It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. - The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. - It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. - The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. - The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. - The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.	NO	Public Access website	02-Jun-24

24/00021/FULEIA	Viana de Oliveira	Sezefredo	- A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. - It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? - It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. - The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. - It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. - The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. - The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. - The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community.	NO	Public Access website	02-Jun-24
24/00021/FULEIA	Howell	Jacqueline	This takes away the religious practice of an ancient house of worship. The proposal is exclusive and undermines the right for worship.	NO	Public Access website	02-Jun-24
24/00021/FULEIA	Levin	Brian	-A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. - It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? - It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. - The proposed building may be well designed and an exemplar of sustainability, but it is simply in the wrong place. It would overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations. - It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. - The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan. - The City Corporation is required to identify locations suitable for tall buildings. It has done some work on this, but there is much more work to be done, and their work eventually has to be assessed by an independent inspector. This process is unlikely to be complete before late 2025. - The developers are arguing that they are providing lots of planning benefits that outweigh the harm to the synagogue. These benefits do not stand up to scrutiny. Many - for example, being car free, demonstrating holistic environmental design, having consolidated deliveries - are simply features that would be expected in any modern commercial building, and they do not represent a gain to the community	NO	Public Access website	03-Jun-24
24/00021/FULEIA	Goodman	Namy	This beautiful building is Historic that has been Built in 1701, before ST Paul's Cathedral. Would you build a 45 Storey near it, to shadow it ? and take away, the light, might disturb the fondations and make the synagogue looking like a draft. It will look too odd next to a very modern, too tall building. We certainly British people WON'T LiKE it.	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Jackson	Matthew	Will block all the light to the historical synagogue I use regularly	NO	Public Access	04-Jun-24
24/00021/FULEIA	Spencer	Michael	nothing should inhibit the integrity and beauty of this longstanding beautiful synagogue	NO	Public Access	04-Jun-24
24/00021/FULEIA	Johnson	Rachel	I'm writing to express my strong opposition to this new application (24/00021/FULEIA). As a British Jew I am beyond disappointed at the lack of respect for a Jewish place of worship. There have been enough assaults in the UK on Jews. This new application shows lack of consideration or respect for the essence of a place of worship. This would not be considered if it were Westminster Abbey. I am appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Gubbay	Candice	Blocking light in a religious institution BEAVIS Marks that has been on this location for decades.	NO	Public Access	04-Jun-24
24/00021/FULEIA	Glyn	Simon	This proposed development is totally unacceptable - it will block the light to the building which is integral to the synagogue experience.	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Glyn	Tamar	This proposed development is completely unacceptable. It will block the light to the building putting it almost entirely in the shade. Access to light is fundamental element of the religious and cultural ethos of this historic building. It is a vital part of London's Jewish history and multicultural society. I can not imagine a similar development with similar aspect being permitted for example next to Westminster Abbey or St.Paul's Cathedral. I most strongly object to this build being permitted it would be a travesty.	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Singer	Amanda	Will block light	NO	Public Access	04-Jun-24
24/00021/FULEIA	Barrie	Francine	This building will completely overshadow Bevis Marks Synagogue. The synagogue will, lose light, and a view of anything other than the new skyscraper .	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Cohen	Sasha	Would block the light at Bevis Marks which would affect our ability to worship there. A new tower block of should not be allowed to be built on a conservation area	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Cohen	Warren	This is a place of worship and I strongly object to a tower block being built close by	NO	Public Access	04-Jun-24
24/00021/FULEIA	Barrie	Michael	Much less light, only view will be a skyscraper. This is particularly disrespectful to a place of worship	NO	Public Access	04-Jun-24
24/00021/FULEIA	Shaw	Julian	This will block out natural light from adjacent buildings.	NO	Public Access	04-Jun-24
24/00021/FULEIA	Shaw	Karen	I object to the proposed tower and need to protect Bevis Marks synagogue. The proposed tower would block the sky view which is fundamental to Jewish worship. It would keep the synagogue in mostly shade. This is an iconic place of worship since 1701 . This historic building needs to be protected. This area is a conservation area which makes this tower even more unacceptable.	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Einhorn	Hilary	This synagogue building is of great historical interest and important to the city of London and a special religious community. It should not be shut out by yet another city bully building which will probably not last the several hundred years as the synagogue has. It is part of London heritage and should be cherished and respected. There are surely enough business premises in that part of the city already	NO	Public Access website	04-Jun-24
24/00021/FULEIA	Tenzer	Karen	Save this beautiful building	NO	Public Access	05-Jun-24
24/00021/FULEIA	Parton	Adam	An attractive proposal with a slim profile to help minimise any impact on nearby sites	NO	Public Access	05-Jun-24
24/00021/FULEIA	Smith	Amanda	Concerns around Loss of Light from the rear of our building, not to mention Bevis Marks Synagogue.	NO	Public Access	07-Jun-24

24/00021/FULEIA	Beloff	Jonathan	Bevis Marks Synagogue must be protected from this unnecessarily large construction protect that will directly and negatively impact the synagogue and religious prayer. With the recent wave of anti-semitism, one would expect the City of London to do all it could to protect this historic synagogue. However, they seem to fail in their duty to protect it. The building will overshadow the synagogue's primary light source, making it impossible to conduct certain religious practices require seeing both daylight and the moon at night. The City of London must reject this call to construct an unneeded new skyscraper that will damage Bevis Marks Synagogue. Do the right thing that will preserve the City's legacy of caring of its religious institutions and history.	NO	Public Access website	07-Jun-24
24/00021/FULEIA	Henley	R	I wish to express my strong objection to this application. This excessive tower scheme will completely obliterate the setting and amenities of the Bevis Marks synagogue (Grade I listed building). Having designated the area within which the synagogue and proposed development as a conservation area this should afford an additional layer of protection to the building. There is no reasoned justification to justify accepting the proposed development which will cause significant and material harm to the heritage and setting of the heritage asset and the character and appearance of the conservation area. There are no public benefits presented for the proposed tower which substantively outweigh the harm that would be caused to Bevis Marks synagogue and the deleterious effect of the loss of light that should the scheme be approved and built. I object to this application in the strongest terms to avoid the destruction of the setting of such an important historic and religious building in the City of London and to the Anglo and World Jewry.	NO	Public Access website	08-Jun-24
24/00021/FULEIA	Jacobs	RIchard	The synagogue is a jewel, and it should not be overshadowed by the proposed new building.	NO	Public Access	12-Jun-24
24/00021/FULEIA	Clapinson	Hannah		N/A	Email (attached in DC- received by email file)	18-Jun-24
24/00021/FULEIA	Forshaw	Kirsty	The proposed 45 storey tower would completely overwhelm the nearby Bevis Marks Synagogue, a Grade 1 Listed building of enormous historic and cultural significance; the only synagogue in Europe that has held regular services continuously for over 300 years. The impact would be catastrophic for the synagogue and its community as not only would the proposed tower overshadow the synagogue and its courtyard for much of the day, reducing the useability of the courtyard for rituals and celebrations, but it would also destroy the southern sky view, which is an essential part of the setting and important for the intangible qualities it contributes to religious ritual. As well as blocking the view of the moon's passage across the sky, and many of the celestial bodies, the proposed tower would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. The proposed building would damage the setting of heritage assets like this in the local area, and would compromise the qualities of the Conservation Area as a whole. I feel that the City Corporation is being disingenuous in claiming to recognise the importance of the synagogue, yet simultaneously facilitating this monstrous development. There is a direct conflict with the statutory development plan to propose this within the Creechurch Conservation Area too, as current planning policy is not to allow tall buildings in Conservation Areas. I believe we should be protecting London's heritage and buildings of such historical and cultural importance as Bevis Marks Synagogue, and expect the same protective standards to be upheld by you, Britain's most prestigious local authority. Would you allow such a tower to be built next to St Paul's Cathedral? If not, we must question why Bevis Marks Synagogue is not being afforded the same protection.	NO	Public Access website	18-Jun-24
24/00021/FULEIA	Rosen	Andrea		N/A	Email (attached in DC- received by email file)	18-Jun-24
24/00021/FULEIA	Keeney	Katie		N/A	Email (attached in DC- received by email file)	18-Jun-24
24/00021/FULEIA	The Honourable Company of Master Mariners			N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Lester	Sara Kyte		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Hepher	Roger		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Arwas	Paul		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Filipe	Andre		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Shiach	Gordon		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Woolich	Anthony		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Beenstock	Gerrard		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Florentin-Lee	Balthazar		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Emerson	Christina		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Aiken MP	Nickie		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	McLeod	Stuart		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Lyons	Simon H		N/A	Email (attached in DC- received by email file)	19-Jun-24
24/00021/FULEIA	Samuel	Hope		N/A	Email (attached in DC- received by email file)	19-Jun-24

24/00021/FULEIA	Lebon	Scott	This impressive proposal has been designed as a slim building to thoughtfully reduce any impact on the neighbourhood. There have been many exaggerated and false claims in the protests. It is wrong to claim that such a slim building will eliminate the view of the sky. The difference in light will be minimal. It is also wrong to claim that the existing light structures in a listed building cannot be updated. The developer has gone to significant lengths to provide important public benefits, which outweigh any perceived disadvantages. This quality proposal is important to the City's success and should be supported.	NO	Public Access website	20-Jun-24
24/00021/FULEIA	Miles	Keith		N/A	Email (attached in DC- received by email file)	24-Jun-24
24/00021/FULEIA	Winston	Steven		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Kalev	David		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Levy	Daniel		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Kett	Russell		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Burchell	James		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Loftus	Jacob		N/A	Email (attached in DC- received by email file)	25-Jun-24
24/00021/FULEIA	Martins	Jonathan		N/A	Email (attached in DC- received by email file)	26-Jun-24
24/00021/FULEIA	Verber	Naomi		N/A	Email (attached in DC- received by email file)	26-Jun-24
24/00021/FULEIA	Benjamin	William		N/A	Email (attached in DC- received by email file)	26-Jun-24
24/00021/FULEIA	Ross	Michael		N/A	Email (attached in DC- received by email file)	26-Jun-24
24/00021/FULEIA	Jackson	Alexandra		N/A	Email (attached in DC- received by email file)	26-Jun-24
24/00021/FULEIA	Garbett	Zoe		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Morris	Alexander		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Jacobus	Laura		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	BEN-NATHAN	Geoffrey	Please see comments dated 22.05.2024.	N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Judaism	Messiah Is		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Morris	Shalom		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Tidswell	Bella		N/A	Email (attached in DC- received by email file)	01-Jul-24
24/00021/FULEIA	Black	Keith		N/A	Email (attached in DC- received by email file)	02-Jul-24
24/00021/FULEIA	Der Zyl	Marie Van		N/A	Email (attached in DC- received by email file)	02-Jul-24
24/00021/FULEIA	E M Johnson	Rachel		N/A	Email (attached in DC- received by email file)	02-Jul-24
24/00021/FULEIA	Gartenberg	Peter		N/A	Email (attached in DC- received by email file)	02-Jul-24
24/00021/FULEIA	Heller	Daniel		N/A	Email (attached in DC- received by email file)	02-Jul-24
24/00021/FULEIA	Salem	David		N/A	Email (attached in DC- received by email file)	03-Jul-24
24/00021/FULEIA	Samuel	Tony		N/A	Email (attached in DC- received by email file)	03-Jul-24
24/00021/FULEIA	Shaw	Geoffrey		N/A	Email (attached in DC- received by email file)	03-Jul-24
24/00021/FULEIA	Whyte	Christopher		N/A	Email (attached in DC- received by email file)	08-Jul-24
24/00021/FULEIA	Eldridge	Charlotte D'Alton		N/A	Email (attached in DC- received by email file)	08-Jul-24
24/00021/FULEIA	Phillips	Jackie		N/A	Email (attached in DC- received by email file)	08-Jul-24
24/00021/FULEIA	Goldberg	Rachelle		N/A	Email (attached in DC- received by email file)	08-Jul-24
24/00021/FULEIA	Barber	Keith		N/A	Email (attached in DC- received by email file)	08-Jul-24

24/00021/FULEIA	Frankenberg	Paul		N/A	Email (attached in DC- received by email file)	09-Jul-24
24/00021/FULEIA	The Honourable Company of Master Mariners			N/A	Email (attached in DC- received by email file)	09-Jul-24
24/00021/FULEIA	The Honourable Company of Master Mariners			N/A	Email (attached in DC- received by email file)	09-Jul-24
24/00021/FULEIA	Dremach	Agniya		NO	Email (attached in DC- received by email file)	10-Jul-24
24/00021/FULEIA	Tessa Sanderson	Troy Richards &		N/A	Email (attached in DC- received by email file)	10-Jul-24
24/00021/FULEIA	Salem	Freddy		N/A	Email (attached in DC- received by email file)	10-Jul-24
24/00021/FULEIA	Carp	Debbie	Please see document tab for comments dated 28.06.2024.	N/A	Email (attached in DC- received by email file)	10-Jul-24
24/00021/FULEIA	Sackman	Sarah		N/A	Email (attached in DC- received by email file)	10-Jul-24
24/00021/FULEIA	Fox	Julie		N/A	Email (attached in DC- received by email file)	15-Jul-24
24/00021/FULEIA	Einhorn	Stanley	This tall building would put this old and wonderful prayer house in darkness. If its not protected now, it should be. I strongly protest and trust any planning or building permissions are turned down.	NO	Public Access website	15-Jul-24
24/00021/FULEIA	Gleen	Carmen		N/A	Email (attached in DC- received by email file)	22-Jul-24
24/00021/FULEIA	Magnus	Alfred		N/A	Email (attached in DC- received by email file)	22-Jul-24
24/00021/FULEIA	Yudkin	Michael		N/A	Email (attached in DC- received by email file)	22-Jul-24
24/00021/FULEIA	Dweck	Joseph		N/A	Email (attached in DC- received by email file)	23-Jul-24
24/00021/FULEIA	Palmer	Joe		N/A	Email (attached in DC- received by email file)	23-Jul-24
24/00021/FULEIA	Mirvis	Ephraim		N/A	Email (attached in DC- received by email file)	24-Jul-24
24/00021/FULEIA	Chambers	Christopher	I and some work aquaintances have been well received in the community space provided over the past year. A continuation of an open commuity space in this area would be a great addition providing much needed for facitlities for community activities as well as useful additional space for an historic building.	NO	Public Access website	03-Sep-24
24/00021/FULEIA	Keliris	Jan		N/A	Email (attached in DC- received by email file)	11-Sep-24
24/00021/FULEIA	Samuels	Lydia		N/A	Email (attached in DC- received by email file)	11-Sep-24
24/00021/FULEIA	Shovelton	Claire		N/A	Email (attached in DC- received by email file)	11-Sep-24
24/00021/FULEIA	Asare-Djan	Jeorge		N/A	Email (attached in DC- received by email file)	11-Sep-24
24/00021/FULEIA	Chohan	Tej		NO	Public Access	11-Sep-24
24/00021/FULEIA	Greenhalf	Mike	I oppose this proposed development on the basis of the adverse impact on an important part of Britains diverse cultural heritage. Bevis Marks Synagogue is a remakable institution with over 3 centuries of continuous history whose longevity itself speaks to Britain's tolerance and continuity through periods of cataclysmic upheaval that affected Europe throughout the long period of the Synagogue's existence. This development irrevocably impairs its geographic context and diminishes it's unique setting.	NO	Public Access website	16-Sep-24
24/00021/FULEIA	Hood	Ralph		N/A	Email (attached in DC- received by email file)	18-Sep-24
24/00021/FULEIA	Lemanski	Mark	I object to the proposal on the basis that the proposal will cause a substantial loss of sunlight and daylight to the adjacent public realm, and the nearby Middlesex Street estate. I believe that the cumulative effect of ever higher buildings is not being sufficiently considered and contradicts the City's aspirations for quality of public spaces and residents' quality of life. I am also concerned about the embedded carbon and don't see how that could possibly tally with the City's sustainability targets.	NO	Public Access website	18-Sep-24
24/00021/FULEIA	King	Emma		N/A	Email (attached in DC- received by email file)	24-Sep-24
24/00021/FULEIA	Dell	Becky		N/A	Email (attached in DC- received by email file)	24-Sep-24
24/00021/FULEIA	Blain	Barry	I strongly oppose this new application. The proposal is for a tower block adjacent to one of the oldest synagogues in Europe, which is still in regular use, a listed building, famous around the world, and a part of the heritage of not only UK Jews but of the whole population. The proposed skyscraper, in a conservation area and immediately next to the synagogue, would dominate and overshadow its setting and the courtyard, reducing the light, and block out the southern sky-view. A similar proposal was rejected a year or two ago, and I hope this appalling proposal is also refused.	NO	Public Access website	09-Oct-24
24/00021/FULEIA	Gauthier	Charlotte	The proposed structure will negatively affect the Creechurch Conservation Area by bringing additional crowds, noise, and traffic, by causing the part-demolition of one historic building, and most of all by blocking the light to the historic Bevis Marks Synagogue, a Grade I-listed place of worship. In a City with hundreds of thousands of square metres of unoccupied office space, this building is simply not needed, nor can the high environmental and amenity costs of its construction be justified.	NO	Public Access website	09-Oct-24
24/00021/FULEIA	Jacobson	David	Having examined the additional information and revised drawings submitted more recently to your office, I cannot see that they affect in any way the numerous objections already lodged against planning application 24/00021/FULEIA.	NO	Public Access website	10-Oct-24

24/00021/FULEIA	Bennett	sarah	I'm writing to express my strong opposition to this new application which is largely similar to the previous application just a couple of years ago. I'm a regular attender at Bevis Marks' Spanish & Portuguese Jewish community and I am shocked and appalled to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This latest application has barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to please refuse this application in the strongest sense.	NO	Public Access website	14-Oct-24
24/00021/FULEIA	Baharier	Linda		N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Goldsmith	Jonathan	Please see document tab for comments dated 08.10.2024.	N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Rose	Peter		N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Green	Edwin	Please see document tab for comments dated 08.10.2024.	N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Frost	Adele	Please see document tab for comments dated 08.10.2024.	N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Mendoza	David		N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Amado	Can	Please see document tab for comments dated 08.10.2024.	N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Parsons	Kathleen	Please see document tab for comments dated 09.10.2024.	N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Eskenzi	Anthony N		N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Jackson	Judy		N/A	Email (attached in DC- received by email file)	15-Oct-24
24/00021/FULEIA	Wakeman	Lindsay	Please see document tab for comments dated 14.10.2024.	N/A	Email (attached in DC- received by email file)	16-Oct-24
24/00021/FULEIA	Platt KC	Eleanor	Please see document tab for comments dated 14.10.2024.	N/A	Email (attached in DC- received by email file)	16-Oct-24
24/00021/FULEIA	Salako	Ara	It's a beautiful area that deserves justice to saved and preserved especially for tourists. This free space should used for museum spaces and more! The public should be able to go out after work.	NO	Public Access website	16-Oct-24
24/00021/FULEIA	Parker	Christopher	Working close by, I believe that this will only add to the amenities in the immediate area.	NO	Public Access	16-Oct-24
24/00021/FULEIA	Blaga	Erika	lovely are which needs more attention and fun places	NO	Public Access	16-Oct-24
24/00021/FULEIA	Salter	Amy	Please see document tab for comments dated 15.10.2024.	N/A	Email (attached in DC- received by email file)	21-Oct-24
24/00021/FULEIA	Mendoza	David		N/A	Email (attached in DC- received by email file)	21-Oct-24
24/00021/FULEIA	Burg	Jonathan	Please see document tab for comments dated 15.10.2024.	N/A	Email (attached in DC- received by email file)	22-Oct-24
24/00021/FULEIA	Solomons	Jonathan		N/A	Email (attached in DC- received by email file)	22-Oct-24
24/00021/FULEIA	Denham	J	Please see comments dated 25.10.2024.	N/A	Email (attached in DC- received by email file)	29-Oct-24
24/00021/FULEIA	Stone	Jeremy	I would like to comment on the Lunar Transit Study performed by the consultants gia and submitted on behalf of Bentall Green Oak. The underlying thesis of this study is that the claims made for the sanctity of the Kiddush Levana ("KL")at Bevis Marks Synagogue are based on the supposedly false premise that there is a meaningful amount of visibility of the lunar disc at night in the relevant parts of the month. The implied argument (the more insidious for being tacit) is that there is in fact so little such visibility that diminishing what there is cannot be regarded as an infringement of the right of worship. However, this implied argument is without merit, and it is important that it should not be allowed to carry the day. I do not wish to dispute the methodology of the study, or its conclusions. The chart of the sky as seen from Point P in January 2024 (Fig 01) makes it clear that the amount of the lunar arc that can be seen is halved, as detailed in Table 01. Thus, the opportunity to observe KL still exists, but is constrained. It is clearly the case that KL can be performed on at least some occasions. But the existing gap in the built skyline is broken into by the profile of the two buildings (one assented, one proposed) and hence the time available for KL is reduced. It could be argued that since some amount of such time remains, infringement on the right of worship would not take place, hence objections grounded on such alleged infringement should be disregarded. This would, in my view, be mistaken. The fact that the existing built environment is already very restrictive does not mean that no damage is done by halving size of the aperture. At times, as can be seen even from Fig 01, the Moon is clearly visible in the night sky for an appreciable period of time, and this would no longer be the case. The complaints remain soundly based, and should be taken properly into account.	NO	Public Access website	31-Oct-24
24/00021/FULEIA	Amado	Can	Please see document tab for comments dated 29.10.2024.	N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Callaghan SJ	Brendan		N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Gauthier	Charlotte	Please see document tab for comments dated 31.10.2024.	N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Teeger	Edward		N/A	Email (attached in DC- received by email file)	05-Nov-24

24/00021/FULEIA	Moreland	Lee S		N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Patel	Dhruv		N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Roache	Anne		N/A	Email (attached in DC- received by email file)	05-Nov-24
24/00021/FULEIA	Jessop	Manuella	another suggestion of a building that will totally overshadow the only Synagogue in Europe to have been in continuous use for over 300 years. Such a building would completely overwhelm this historic building - such a thing would never be allowed to Westminster Abbey or St Pauls Cathedral - why is this being allowed for a Jewish building? There is already very limited natural light into this beautiful building - adding a 45 storey monstrosity (against all the rules of a conservation area such as Creechurch) would only block out what is remaining. I am utterly appalled that you continue to consider applications that encroach on the Grade 1 listed Bevis Marks synagogue, particularly as there is no perceptible difference between this new application and the previous (rightly) rejected applications. Bevis Marks is the most historically significant place of worship for the Jewish Community in England, and allowing such overbearing, intrusive development around the Synagogue is patently ridiculous. This would be immediately refused around St Pauls Cathedral or Westminster Abbey, and begs the question of why the needs of the Jewish community who regularly worship at Bevis Marks are being ignored.	NO	Public Access website	07-Nov-24
24/00021/FULEIA	Jessop	David	Once again this plan is submitted which will ruin the important and historic Bevis Marks Synagogue. This, the oldest in the UK, already has lost a great deal of light and this frankly unneeded building will make the situation even worse. It will also interfere with the new Creechurch conservation area.	NO	Public Access website	07-Nov-24
24/00021/FULEIA	Moses	Selina	Once again, Bevis Marks needs to be left alone as an important heritage site	NO	Public Access	11-Nov-24
24/00021/FULEIA	Burg	Jonathan	Please see document tab for comments dated 06.11.2024.	N/A	Email (attached in DC- received by email file)	12-Nov-24
24/00021/FULEIA	Dimoldenberg	Paul		N/A	Email (attached in DC- received by email file)	12-Nov-24
24/00021/FULEIA	Ben Garcia	Lawrence		N/A	Email (attached in DC- received by email file)	12-Nov-24
24/00021/FULEIA	Green	Charlotte	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Bonnet	Joel	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Jackson	Judy		N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Sicsic	Laurent		N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Timan	Ezra	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Timan	Ruth	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Obadiah	Sophie	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Morgan	Leslie	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Morgan	Cyril	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Zubaida	David	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Mendoza	Alan	Please see document tab for comments dated 07.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	shamash	david	Please see document tab for comments dated 08.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Baroukh	Vivien	Please see document tab for comments dated 09.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Bilbul	Jonathan	Please see document tab for comments dated 09.11.2024.	N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Lampert	Dorothy		N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Salem	Freddy		N/A	Email (attached in DC- received by email file)	13-Nov-24
24/00021/FULEIA	Conolly	Paul		N/A	Email (attached in DC- received by email file)	18-Nov-24
24/00021/FULEIA	Yudkin	Ben		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Bogod	Howard	Please see document tab for comments dated 11.11.2024.	N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Ridler	Katharine	Please see document tab for comments dated 12.11.2024.	N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Jacobs	Everett M		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Felcher	Dave		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Lawrence	Beverley		N/A	Email (attached in DC- received by email file)	19-Nov-24

24/00021/FULEIA	Lieber	Stephanie		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Timan	Ruth	Please see document atb for comments dated 16.11.2024.	N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Sacerdoti	Daniel	Please see document tab for comments dated 17.11.2024.	N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Schmool	Marlena		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Kramer	Miriam	Please see document tab for comments dated 18.11.2024.	N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Kramer	Stephen		N/A	Email (attached in DC- received by email file)	19-Nov-24
24/00021/FULEIA	Hepher	Roger		N/A	Email (attached in DC- received by email file)	20-Nov-24
24/00021/FULEIA	Green	Michael	Please see document tab for comments dated 19.11.2024.	N/A	Email (attached in DC- received by email file)	20-Nov-24
24/00021/FULEIA	Album	Edward		N/A	Email (attached in DC- received by email file)	20-Nov-24
24/00021/FULEIA	Rosen	Andrea		N/A	Email (attached in DC- received by email file)	20-Nov-24
24/00021/FULEIA	vogel	mira	Please respect this grade 1 listed building and its conservation area which will likely outlast the short term buildings erected around it. Please respect the place of the synagogue in the history of British Jewry.	NO	Public Access website	20-Nov-24
24/00021/FULEIA	Halpern-Matthews	Dalia	Ms A Tastsoglou, Planning Department, City of London PO Box 270 Guildhall, London EC2P 2EJ 21st November 2024 Dear Ms Tastsoglou, Re: Planning application 24/00021/FULEIA Bury House London EC3A 5AR I am writing on behalf of Chatham Memorial Synagogue and the Jewish community of Kent. We strongly object to the above planning application on the grounds of the negative impact it will have on the Grade I listed Bevis Marks Synagogue (BMS) and the communities who use it. BMS is the oldest surviving synagogue in the UK, and is the only one which has been continually in use in Europe for over 320 years, since soon after Jews were allowed back into England. It is deeply significant to Jews across the UK, and is deeply resonant of our freedom here. Any works which impede the use in any way of this significant site are deeply offensive; in particular, the impact of the above development which, through its reduction in natural daylight to the synagogue and courtyard, will disrupt the ability of the synagogue to worship in accordance with our faith. We believe that this proposal breaches the rights of the Jewish community under the Equalities Act 2010, and sincerely hope that permission is, again refused. Yours sincerely	NO	Public Access website	21-Nov-24
24/00021/FULEIA	Fox	Vicki		N/A	Email (attached in DC- received by email file)	22-Nov-24
24/00021/FULEIA	Jackson	Elizabeth	This building, of immense cultural & historic importance, would be overwhelmed by the sheer scale & inappropriate placement of the proposed tower. It is inconceivable that such a structure would be allowed at St. Paul's Cathedral, yet the synagogue is not afforded the same protections. The development would obliterate the southern sky view, integral to its religious rituals, including the observation of celestial events. The resulting overshadowing would render the synagogue courtyard unusable for many rituals & celebrations, while the already limited natural light within the building would be further diminished. Due to the synagogue's historic nature, additional electric lighting is not an option. This site falls within the Creechurch Conservation Area, where tall buildings are NOT permitted under current planning policy. The development directly conflicts with the statutory development plan; the City Corporation's work on identifying suitable sites for tall buildings is incomplete & not independently assessed. Approving this development ahead of this process would undermine proper planning protocols. The developers claims do not withstand scrutiny and do not justify the harm to the synagogue. The restoration of Holland House, should not be used to justify such an inappropriate scheme, particularly when its purported community benefits are questionable. Furthermore, the existing building at 31 Bury Street is only 40 years old & capable of refurbishment, avoiding the environmental cost of unnecessary demolition. The proposed tower would also damage the setting of other heritage assets and compromise the character of the Conservation Area as a whole. It is deeply disappointing that the City Corporation is facilitating this monstrous development. We are to expect much higher standards from Britain's prestigious local authority. I urge you to reject this proposal & protect the integrity of our heritage and planning policies.	NO	Public Access website	22-Nov-24

24/00021/FULEIA	Kirby	Jack	I am a museums and heritage professional and have personally visited Bevis Marks Synagogue and appreciated its heritage significance. This is an extremely important building in the history of England's Jewish population, and as the list entry notes is of exceptional historical interest. I note that this application follows a refused application (20/00848/FULEIA). I have read a number of reports and letters prepared by consultants acting on behalf of the applicant, and while I acknowledge that the current application differs in details, I do not consider that these have demonstrated significant variations that would impact the reasons that the previous application was refused. The scheme is fundamentally unsuitable for this sensitive site. I concur with Historic England's opinion that the proposed development would cause substantial harm to both Tower of London World Heritage Site and the Grade I listed Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard. It would also cause substantial harm to the character and appearance of the Creechurch Conservation Area. Daylight is of the highest significance to the largely unaltered listed interior of the Synagogue, and the proposed development would have an unacceptable impact on internal daylight levels. It would also unacceptably overshadow the courtyard of the Synagogue, and the ritually important view of the passage of the moon across the night sky. The Planning Statement and other reports and correspondence make a series of technical responses but these merely serve to identify that the scheme is little different in impact to that previously refused. The proposed development would also harm the Grade II* Holland House. I disagree with the assessment contained in Heritage Statement, and support the comments of Historic Buildings and Places and the Twentieth Century Society. I call upon the City of London to refuse this unsuitable application.	NO	Public Access website	22-Nov-24
24/00021/FULEIA	Shindler	Jeremy	I would ask the committee to consider if this development would be permitted if it were overshadowing St Pauls cathedral in the same proportions: one suspects not. Bevis Marks Synagogue is a major part of the heritage of the City of London and it's history as a trading city. A construction of the size and location proposed will fundamentally change the atmosphere, light and ambience of this Grade 1 listed building. Aside from the tragedy of this in it's own right, what precendence does this set about the future protection of other Grade 1 listed buildings both in the City and more widely.	NO	Public Access website	23-Nov-24
24/00021/FULEIA	Gomes da Costa	Marcus	The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets. The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels. The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses. The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.	NO	Public Access website	25-Nov-24
24/00021/FULEIA	Singh	Param		N/A	Email (attached in DC- received by email file)	25-Nov-24
24/00021/FULEIA	Halpern-Matthews	Dalia	Please see document atbb for comments dated 21.11.2024.	N/A	Email (attached in DC- received by email file)	25-Nov-24
24/00021/FULEIA	Coriell	Lois		N/A	Email (attached in DC- received by email file)	25-Nov-24
24/00021/FULEIA	Jackson	LiLi		N/A	Email (attached in DC- received by email file)	25-Nov-24
24/00021/FULEIA	Kirby	Keith	I object to this proposal which will have a very bad effect on the Grade 1 listed Bevis Marks Synagogue in the Creechurch Conservation area. The tower block if constructed would block natural light to Bevis Marks, which would be detrimental to the religious experience of users. It would also prevent the view of the passage of the moon, which is very significant for the congregation. If approved this development would compromise the experience of worship for the users of the synagogue. Despite claims to the contrary, the proposal is not any improvement on the previous proposal which the City rightly rejected. I urge that the proposal should be rejected.	NO	Public Access website	25-Nov-24
24/00021/FULEIA	Gordon	Henrietta	St Paul's is protected why is the same protection not afforded to the place of worship of another religion? It would appear to amount to discrimination.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Clucas	Jane		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Jeanette R	Rosenberg		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Warlow	Neil	This is an unnecessary and outscale development within a newly designated Conservation Area, and which would materially harm a cultural and religious asset of irreparable public value and continued faith usage. As a local worker, I object to the further attempt to force through a plan that has already been rejected twice.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Hopson	Jacqueline Langer		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Brodie	Philip	Please see document tab for comments dated 23.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Brett	Richard	Please see document tab for comments dated 23.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Paldi	Amnon		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Say	Nathan		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Allan	Tony		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Seres	Jennye	Please see document tab for comments dated 24.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Musikant	Kris	Please see document tab for comments dated 24.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Hillman	Basil		N/A	Email (attached in DC- received by email file)	26-Nov-24

24/00021/FULEIA	Patchick	Jonathan	Please see document tab for commenss dated 24.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Costa	Marcus Da		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Blake	Rachel		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Stern	Gerald		N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	Musikant	Barry	Please see document tab for comments dated 25.11.2024.	N/A	Email (attached in DC- received by email file)	26-Nov-24
24/00021/FULEIA	hoffman	jonathan	A 45 storey tower would completely overwhelm the synagogue, which is a Grade 1 Listed building of enormous historic and cultural significance. It is inconceivable that such a building would be allowed next to St Paul's cathedral, so why is the synagogue not afforded the same protection? It would destroy the southern sky view, which is an essential part of the setting of the synagogue, and important for the intangible qualities it contributes to religious ritual. The view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. It would also further reduce the already minimal daylight that penetrates into the synagogue, making it even more difficult to conduct worship. Because of the historic nature of the synagogue, installing additional electric lighting is not feasible. The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict with the statutory development plan.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Ten Dam	Melissa	This is A devastation on a beautiful skyline of important architectural and religious buildings. These are pieces of our heritage and should not be dominated by a new building which is not reflective of the style of the area around it is far too tall. Therefore I think the new building should be much shorter about half the height. Not damage the skyline of London.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Barton	Isn	Given location in city of London, development of an under utilised and poorly maintained existing urban environment should be supported, the plans present a high quality development fitting the location and predominant use of land in the local proximity.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Reginald	S	If approved, this proposal will become a wonderful addition to our skyline, I believe the design of the proposal to be unique and attractive, and would stand out well amongst what is otherwise a sea of mostly glass and steel. I like the artdeco style of the cladding and the window arrangement, and the inclusion of the refurbishment of Holland House significantly improves the design. I think it's a little too late for some to be addressing the shadowing issues as the Synagogue has already been overshadowed by several taller towers including the Gherkin tower, and the tower at One Creechurch Place nextdoor. On the opposite end of the Synagogue are the soon to be build Bevis Marks House tower and 115 Houndsditch proposals. More than that, we cannot ignore the proposal for 100 Leadenhall which will add a 250m+ skyscraper, all in close proximity to the Synagogue. I don't see why this particular proposal should be isolated for critique if multiple skyscrapers have not just been planned and approved but also already built around the site. Furthermore, we cannot ignore the status of the City cluster as the global financial hub and has always consisted of a mix of old and new for over 2,000 years. There are other sites around the cluster, churches that are overshadowed by towers double in height to this one, and one could also note St Helen's church next to the now planned 310m 1 Undershaft.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Risenbaum	Danny	In the words of Simon Sebag Montefiori: "Bevis Mark is a British historic treasure as well as a Jewish one. It is a place of great beauty and history. And it is vital that it is protected into the future from looming brutal tower-blocks that will ruin and overshadow this exquisite jewel of British and Jewish history and culture." I concur and this sentiment forms the main grounds for my objection.	NO	Public Access website	26-Nov-24
24/00021/FULEIA	Pollak	Miriam A.		N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Yudkin	Michael		N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Black	Pat	Please see document tab for comments dated 26.11.2024.	N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Walker	Anne	Please see document tab for comments dated 26.11.2024.	N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Keiner	Judy (Celia Judith)	Please see document tab for comments dated 26.11.2024.	N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Musikant	Adam		N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Simon	Barbara		N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Schonfield	Jeremy	Please see document tab for comments dated 27.11.2024.	N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Schonfield	Tamar	Please see document tab for comments dated 27.11.2024.	N/A	Email (attached in DC- received by email file)	27-Nov-24
24/00021/FULEIA	Johns	Leslie	Bevis Mark is a historical treasure known throughout the world as a building of unique cultural and religious significance. This building project will have a detrimental effect on the building, the local Jewish community, tourism, and London's reputation as a protector of the Jewish people. Please do not diminish this treasure.	NO	Public Access website	27-Nov-24
24/00021/FULEIA	Rabbs	Margaret	Desecration ..,.. Like destroying Westminster Cathedral in terms of religious importance to the Jewish faith.	NO	Public Access website	28-Nov-24

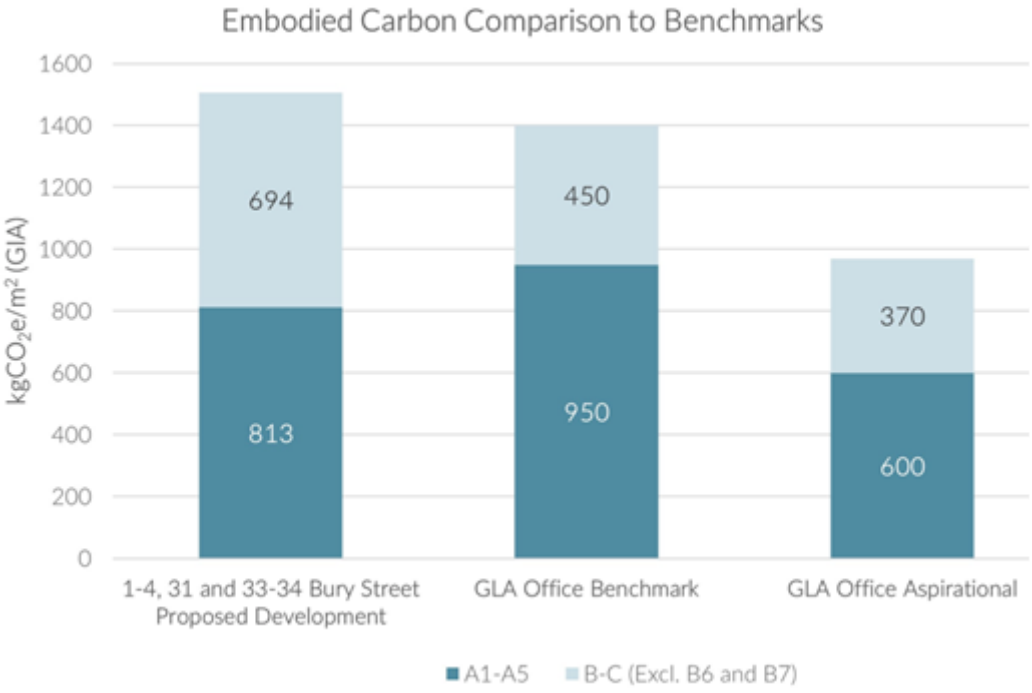
24/00021/FULEIA	Winch	Dinah	I am writing to object to this proposed development which will cause significant harm to Grade I-listed Bevis Marks synagogue, and the very recently designated Creechurch conservation area, which includes the Grade II*- listed Holland House. A previous application was refused because of the harm that it would cause to the synagogue due to the overbearing and overshadowing impact on the building and courtyard. The current proposal does not overcome the previous reasons for refusal, and now includes unacceptable impact on Holland House as well. Bevis Marks synagogue was designed with large clear windows to maximise light in the building and light continues to be essential to worship there, not least because additional electric light can't easily be installed without damaging the fabric of the interior, largely unchanged since 1701, and because electricity is not permitted on the sabbath and festivals. Additionally the development would block moonlight, a crucial component of Jewish worship. Bevis Marks synagogue is not only the oldest purpose-built synagogue in Britain but the home of a living congregation. Its significance as the only synagogue in Europe to maintain uninterrupted worship since its founding over 320 years ago, and its historic, architectural and cultural importance to Britain cannot be overstated. I urge you to refuse this application.	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Lawson	Susannah	This is a hugely insensitive proposal which will impact worshippers at the synagogue, blocking light from the courtyard for events and also reducing light levels inside, in a building that cannot be altered because it's listed. Bevis Marks is the oldest synagogue in the country and a unique architectural gem. This kind of development would never be allowed right next to St Paul's. The Jewish community also deserves the same consideration for their place of worship.	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Ozer	Ketty		N/A	Email (attached in DC- received by email file)	28-Nov-24
24/00021/FULEIA	Sackman	Simon	I strongly object to this application.I have been a member of the Spanish & Portuguese Jewish community for over 40 years. I regularly attend services at Bevis Marks Synagogue and I and two of my daughters were married there. I am very familiar with this part of the City, as my office for over 30 years was in Camomile Street. Bevis Marks Synagogue is the jewel in the crown of this country's Jewish community and one of which the City of London should be proud and anxious to preserve. The current application has barely changed from the developer's original application in 2022, to which I also objected. In the context of the setting of the synagogue, the difference between a 45-storey tower and the previous 48-storey tower is negligible. The proposed development, like the original proposal, is totally at odds with the conservation of a Grade 1 listed building, which is now also in the Creechurch Conservation Area established by the City Corporation only a few months ago. The new tower would overshadow the synagogue and its courtyard and crucially reduce the natural light illuminating the synagogue's interior, materially impairing the environment in which religious services take place and have done so continuously since 1701. Further, the incorporation of 4 basement levels in the new building would risk damaging the very structure of the 323-year old synagogue.The City Corporation rightly rejected the 2022 application and should do the same again now; there are more than enough tall buildings in the area. What is the point of creating a conservation area and then allowing irreparable harm to one of the few remaining heritage buildings in that area? Such a proposal would never be entertained near St. Paul's Cathedral and should not be permitted just yards from the most important Jewish building in Britain.I urge the City Corporation to refuse this application and make clear that no application on anything like the proposed scale will ever be entertained. I obje	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Chait	Stan	A 45 story complex would have a detrimental affect on the synagogue. This would not be allowed close to St Paul cathedral.	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Collins	Peta	Totally inappropriate height of building for the area Detrimental to the world renowned grade 1 listed synagogue	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Berman	Gerald	It is an overpowering presence...blocking views of an historic building..blocking light from a religious building that relies on it for services...and it is yet another penile structure without any visual architectural merit...neither modernist, post modern or brutalist. It is purely a tower of rampant greed. DO NOT ALLOW THIS TO BE BUILT.	NO	Public Access website	28-Nov-24
24/00021/FULEIA	Issroff	Rahle	Think the synagogue should be preserved	NO	Public Access	29-Nov-24
24/00021/FULEIA	Natali	P		N/A	Email (attached in DC- received by email file)	29-Nov-24
24/00021/FULEIA	Gardiner	Marc	Please respect the sanctity and dignity of a 320 year old place of worship - a unique building with an extraordinary history that deserves to be cherished and not buried between skyscrapers - would you do that to St Paul's?	NO	Public Access website	29-Nov-24
24/00021/FULEIA	Freeman	Julian	I can only endorse the most comprehensive of the objections raised: it is surprising that the area around Bevis Marks remains so attractive to developers, when they know that noise, detritus and overpowering height will cause physical and environmental damage for years to come. For all the reasons cited - its age, visual beauty and historical value, not to mention its continued use - the planning application should be shelved once and for all. To allow the proposal to go ahead would be an act of folly.	NO	Public Access website	30-Nov-24
24/00021/FULEIA	Baxter	Christina	A place of worship for 100s of years. The synagogue is a rare and beautiful building with connections worldwide. The new buildings will block out light which is crucial to the site and further crowd in on this religious site. Either build something sensible low rise housing would be wonderful but of course the developers need to make the money. It will be another building with out style and no doubt be empty for years. Whereas the synagogue is a place of worship and a delightful place to visit whether of the faith or not. As a City of London Guide, please do not allow this place to be crowded in and hidden further from the public.	NO	Public Access website	30-Nov-24
24/00021/FULEIA	O?Hara	Moya	The new development would have a negative effect on Bevis Marks synagogue and the local area, impacting on the aesthetic appearance and local character and cutting out natural light to the synagogue.	NO	Public Access website	30-Nov-24
24/00021/FULEIA	Morley	James	I fully support this application as the provision of additional office space in the city. The proposed small plates will help fill a gap in the market and contribute to continued jobs and employment. I trust that the benefits will be recognised and the project approved.	NO	Public Access website	01-Dec-24
24/00021/FULEIA	Segall	Edwin	Please see document tab for comments dated 28.11.2024.	N/A	Email (attached in DC- received by email file)	02-Dec-24
24/00021/FULEIA	Natali	P		N/A	Email (attached in DC- received by email file)	02-Dec-24

REFVAL	SURNAME	FIRST NAME	COMMENT	RESTRICTED COMMENT	HOW RECEIVED	DATE
24/00011/LBC	Edwards	Alison	Thank you for notifying the Council for British Archaeology (CBA) of this application. Holland House is an architecturally distinguished office building completed in 1916, designed by Hendrik Petrus Berlage. It is listed Grade II*, putting it in the top	NO	Public Access website	15-May-24
24/00011/LBC	Waller	Eddie		N/A	Email	24-Oct-24

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

1. **Application cover sheet amendments**

13. OPERATIONAL CARBON EMISSIONS	**33,941** tonnes CO_2 over 60 years **0.822** tonnes CO_2 per square meter over 60 years (includes life-cycle modules B6+B7)
14. EMBODIED CARBON EMISSIONS	**PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS**  Upfront embodied carbon: 33,565 tonnes CO_2e / 813 $kgCO_2e$ per sqm In use embodied carbon: 28,643 tonnes CO_2e / 694 $kgCO_2e$ per sqm
15. WHOLE LIFE - CYCLE CARBON EMISSIONS	Whole life-cycle carbon emissions: **95,199 tonnes CO_2** Whole life-cycle carbon emissions per square meter: **2,305 tonnes CO_2/sqm**

2. Letters of Representation

2.1. Since the publication of the PASC Committee Agenda further representations have been received.

2.2. One letter objecting to the proposed development and two in support have been received.

2.3. The points raised in the letter objecting to the proposed development and officer responses are included in the table below.

Example representation from (non-statutory) organisations, groups and individuals (objections)	Comments and Officers Response to Comments
Roger Hepher, on behalf of the S&P Sephardi Community (an additional letter was received, dated 10 December 2024)	**The letter stated that all previously raised objections are maintained. The following observations are made regarding the published report.** • In the summary on page 3, the report refers to 'several objections' having been made by third parties, and on page 8 'a number of objections' is referred to. This wording is misleading and does not accurately convey the extent of public (over 1,400) and statutory objections that have been received in response to the application. We appreciate that the full extent of objections is set out elsewhere in the report and accompanying appendices, however due to the length of this document the accuracy of the summary is very important. • Page 10 summarises the findings of BRE's Independent Review of the applicant's Lunar Transit Study prepared by GIA (this is repeated later in the report). The way that this is presented omits to mention BRE's conclusion that (our emphasis) '*the relative reduction in the hourly visibility of the lunar bracelet from the Synagogue*

	courtyard would be significant with the proposed development in place'. Rather, the report attempts to portray the impact as insignificant, through a selective presentation of figures. We also strongly disagree with the statement that '*in theory there would always be enough visibility to recite the prayer'* (in the summary and paragraph 458). The Lunar Review prepared by Rabbi Shalom Morris and submitted alongside our objection dated 15th November 2024 found that, based on analysis of the GIA data, the proposed tower would result in the loss in the ability to recite the prayer in 3-5 months per year, causing a reduction in the occasions that the community are able to recite Kiddush Levana by between 33% and 55%. **Officer comment: The impact of the development on the visibility of the moon and night sky is assessed in detail in pages 1001-1007 of the Agenda. The point raised in the third party review are clearly and transparently assessed in the report. The independent review is also available on the Corporation's website. The impacts of the development are acknowledged and are given significant weight.** **With regard to the data presented in the report, it is noted that these are based on the data included in the Lunar Transit Study submitted by the Applicant, the additional information provided following discussions with the Synagogue's Rabbi and the review report received by the CoL's appointed consultant.** • Paragraph 11 of the Committee Report states that the site is not located within the immediate setting of Bevis Marks Synagogue, as defined in the emerging Local Plan. There are extensive objections specifically regarding the immediate setting policy in the emerging Local Plan, therefore this should be given very little, if any, weight by Members when considering the applications (in

	accordance with paragraph 48 of the NPPF). 'Immediate setting' is not an established concept in heritage terms. **Officer Comment: Comment noted. As explained at various points within the report, the emerging City Plan 2040 is not to be given as much weight as the adopted Local Plan 2015 at this stage.** • Paragraph 182 states that Policy CS14(2) of the adopted Local Plan '*does not require that every application for a tall building in a conservation area must be refused; other factors should also be considered'*. In fact, Policy CS14 could not be clearer in its wording that all applications for tall buildings within conservation areas should be refused: '*To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by: (1) Permitting tall buildings on suitable sites within the City's Eastern Cluster. (2) Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas […]'.* The policy does not in fact indicate that other factors should be considered. Paragraph 182 also states that Policy CS14(1) is supportive of the proposal. CS14(1) refers to suitable sites within the City's Eastern Cluster, it is abundantly clear from CS14(2) that conservation areas are not considered suitable for tall buildings. Therefore we strongly disagree with the interpretation of policy CS14 which is set out in paragraph 182; in fact the proposal represents a head-on and unambiguous conflict with Policy CS14, which in our view is downplayed within the report. **Officer response: Officers clarify that the point being made in the report is that despite the**

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

	As set out in the report, particularly para 219, officers conclude that, having considered all the relevant policy requirements and detailed assessments of impact, the site is suitable for a tall building in the overarching sense, and as such complies with policy CS1 and draws support from CS14(1). • Paragraph 429 states '*it has been argued by S&PSC and other objectors that there is a 'sky view' of the Synagogue from the entrance to the courtyard, where the building is seen with clear sky above'*. This is a strange choice of wording – it is factual that there is a view of the sky from within the courtyard and this is not a subjective argument. Paragraph 429 and the following paragraphs seek to downplay the importance of the sky view, despite abundant evidence having been presented of both the practical and spiritual significance of this view, which we do not repeat here. We strongly disagree with the assertion in paragraph 449 that '*the proposal would, in most areas of the courtyard, be seen only as a glimpsed and partial presence'.* **Officer response: Comment noted. The wording of 'the sky view' is specifically used in some of the objections, notably the Synagogue's objection of 15 May 2024, and officers have followed this wording.** • Paragraph 453 implies that the 'theme of objection' of the moon view was not raised as part of the S&P Sephardi Community's objections to the previous application at this site. This is inaccurate, page 16 of the Bevis Marks Synagogue Significance & Community Impact Study dated 7 April 2021 and submitted as an objection to the previous application clearly states that *'In fact, a special prayer (kiddush lebana) is recited each month upon only seeing the moon in the night sky, something we won't be able to do if buildings block out our views of the eastern and southern sky)'.* It

	is true that the objection relating to the moon view is more clearly articulated in relation to the present application; this is not a reason to downplay its importance, but instead a reason to pay closer attention. **Officer response: Comment noted. Paragraph 453 of the report does not claim that this theme of objection was not raised previously, only that it did not form part of the previous Reasons for Refusal. This proposal's impact on the moon view has been assessed in exhaustive detail.** • Paragraph 461 refers to a third-party review of the applicant's daylight/sunlight assessments. We have not been provided with a copy of this third-party review and it does not appear to be available on the planning register. We again request a copy of this document. **Officer comment: Comment noted. The independent review is now available on the public access.** • Paragraph 1104 refers to a third-party review of the S&P Sephardi Community's independent daylight report. We note that this has now been uploaded to the planning register and is dated 9th December 2024, yet is summarised in the Officer's Report which was made public on Thursday 5th December. We note that we have not previously been provided with a copy of this report or had the opportunity to respond. **Officer comment: It is noted that the LPA for inclusivity reasons and to encourage public engagement accepts representations made after the publication of the Agenda and until the date before the determination of the application, as it has been done with the current representation.**

	• As set out in the report we have submitted three letters of objection to date. However our second letter of objection dated 15th November 2024 does not appear to be included within the appendices/supporting documents presented to Members. **Officer comment: Comment noted. The representation is available on the CoL website. Although it was missed from the original background papers pack, it is now included as part of this addendum, for completeness.**

2.4. The following points are raised in the support letters received:
- The development is in the heart of the City of London and should be allowed.
- The Synagogue is surrounded by tall buildings.
- The proposed community hub within Holland House would establish an inclusive community.

2.5. It is noted that some representations, both in support and objecting to the proposed development, although always available on the CoL's website, have been missed from the background papers. These are included in the background papers of this addendum.

3. Sustainability

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

3.1. Paragraph 1240:

The table - figures (kg/CO2/m2) are revised as follows:

A1-A5: 813

A-C (excl. B6-B7): 1,483

B6+B7: 822

A-C (incl. B6-B7): 2,305

3.2. Paragraph 1241 to be replaced with the following.

The proposed whole site development would result in overall whole life-cycle carbon emissions of **95,198,683 kgCO2** being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for **33,941,165 kgCO2** (35.7% of the building's whole life-cycle carbon), and the embodied carbon emissions for **61,257,518 kgCO2**, (64.3% of the building's whole life-cycle carbon).

4. Corrections

4.1. Please note the following errata corrections:

4.2. Paragraph 219:

Overall, Officers considered the site to be acceptable for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, C and D, Local Plan policies CS7 (1,2 and 4-7) and CS 14 (1 and 4), draft City Plan 2040 S12 and most relevant parts of S21.

4.3. Paragraph 220:

It is recognised that, due to the proposal's location within the Creechurch Conservation Area, there would be a conflict with CS7 (3), CS 14 (2) and therefore London Plan D9 (B). There would also be a degree of conflict with emerging policy S21 (5) due to the impact on Holland House. This conflict with Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

4.4. Second paragraph on page 563 and paragraph 1374 on page 1018:

It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with, as policies relating to office floor space delivery, Eastern/City Cluster and public realm would be complied with that, notwithstanding the conflict with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces), CS7 (3) (Eastern Cluster), CS14 (2) (Tall Buildings); Draft City Plan Policies 2040 S11 (Historic Environment), S21(5) (City Cluster Key Area Of Change) and London Plan D9 B (3) (Tall Buildings) and HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

4.5. Please note that an error in the paragraphs' numbering has been identified in the agenda report, repeating the numbering of paragraphs 1330 to 1379 twice on different pages.

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From: PlnComments@cityoflondon.gov.uk
To: PLN - Comments
Subject: Comments for Planning Application 24/00021/FULEIA
Date: 03 December 2024 12:10:32

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 03/12/2024 12:10 PM from Luka Karathanos.

Application Summary

Address:	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal:	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Case Officer:	Anna Tastsoglou

Click for further information

Customer Details

Name:	Luka Karathanos
Email:	[redacted]
Address:	7 Phoenix Close London

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer made comments in support of the Planning Application
Reasons for comment:	
Comments:	The development is in the heart of the city of london, of course it should be allowed. All the objections because of the synagogue being shaded miss that the synagogue is already surrounded by very tall buildings, and almost always in the shade already. This one will hardly make it much worse. Many people saying they are objecting to "save the synagogue". This is ridiculous, the synagogue is not going anywhere, it will not be touched. I hope city of london don't bow to nimbys.

Kind regards

hgh

Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

10 December 2024

Dear Ms Tastsoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Response to Report to the Planning Application Sub-Committee

On behalf of our client, The S&P Sephardi Community, we write further to our previous letters dated 15 May 2024, 15 November 2024 and 28 November 2024, in relation to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

In light of the extensive objections received by the City of London to this application (including over 1,400 public objections) it is disappointing to see that Officers recommend approval of these applications. We will not repeat our objections here but instead we make several observations and clarifications in relation to the content of the Committee Report.

We would also like to reiterate our strong concern regarding the date and timing of the Committee, taking into account the nature of the public objections, many of which come from the Jewish community. The Committee is to be held on Friday 13th December, which is one of the earliest Shabbats of the year. This makes it at best inconvenient for many objectors to attend or watch the Committee, and the situation is worsened by the fact that there is another large and contentious application on the agenda prior to the Bury Street applications. We have already alerted the City of London numerous times as to the difficulties that the timing of the Committee presents for our clients and the wider Jewish community.

In relation to the 574-page Committee Report, we make the following observations. To be clear, we maintain all of our previous objections and do not respond here to the content of the report (much of which we disagree with) - instead we largely focus on key factual, procedural points and clarifications.

- In the summary on page 3, the report refers to 'several objections' having been made by third parties, and on page 8 'a number of objections' is referred to. This wording is misleading and does not accurately convey the extent of public (over 1,400) and statutory objections that have been received in response to the application.

  We appreciate that the full extent of objections is set out elsewhere in the report and accompanying appendices, however due to the length of this document the accuracy of the summary is very important.

- Page 10 summarises the findings of BRE's Independent Review of the applicant's Lunar Transit Study prepared by GIA (this is repeated later in the report). The way that this is presented omits to mention BRE's conclusion that (our emphasis) '*the relative reduction in the hourly visibility of the lunar bracelet from the Synagogue courtyard would be significant with the proposed development in place*'. Rather, the report attempts to portray the impact as insignificant, through a selective presentation of figures.

  We also strongly disagree with the statement that '*in theory there would always be enough visibility to recite the prayer*' (in the summary and paragraph 458). The Lunar Review prepared by Rabbi Shalom Morris and submitted alongside our objection dated 15th November 2024 found that, based on analysis of the GIA data, the proposed tower would result in the loss in the ability to recite the prayer in 3-5 months per year, causing a reduction in the occasions that the community are able to recite Kiddush Levana by between 33% and 55%.

- Paragraph 11 of the Committee Report states that the site is not located within the immediate setting of Bevis Marks Synagogue, as defined in the emerging Local Plan. There are extensive objections specifically regarding the immediate setting policy in the emerging Local Plan, therefore this should be given very little, if any, weight by Members when considering the applications (in accordance with paragraph 48 of the NPPF). 'Immediate setting' is not an established concept in heritage terms.

- Paragraph 182 states that Policy CS14(2) of the adopted Local Plan '*does not require that every application for a tall building in a conservation area must be refused; other factors should also be considered*'. In fact, Policy CS14 could not be clearer in its wording that all applications for tall buildings within conservation areas should be refused: '*To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by: (1) Permitting tall buildings on suitable sites within the City's Eastern Cluster. (2) Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas [...]*'. The policy does not in fact indicate that other factors should be considered.

  Paragraph 182 also states that Policy CS14(1) is supportive of the proposal. CS14(1) refers to suitable sites within the City's Eastern Cluster, it is abundantly clear from CS14(2) that conservation areas are not considered suitable for tall buildings. Therefore we strongly disagree with the interpretation of policy CS14 which is set out in paragraph 182; in fact the proposal represents a head-on and unambiguous conflict with Policy CS14, which in our view is downplayed within the report.

- Paragraph 429 states '*it has been argued by S&PSC and other objectors that there is a 'sky view' of the Synagogue from the entrance to the courtyard, where the building is seen with clear sky above*'. This is a strange choice of wording - it is factual that there is a view of the sky from within the courtyard and this is not a subjective argument. Paragraph 429 and the following paragraphs seek to downplay the importance of the sky view, despite abundant evidence having been presented of both the practical and spiritual significance of this view, which we do not repeat here. We strongly disagree with the assertion in paragraph 449 that '*the proposal would, in most areas of the courtyard, be seen only as a glimpsed and partial presence*'.

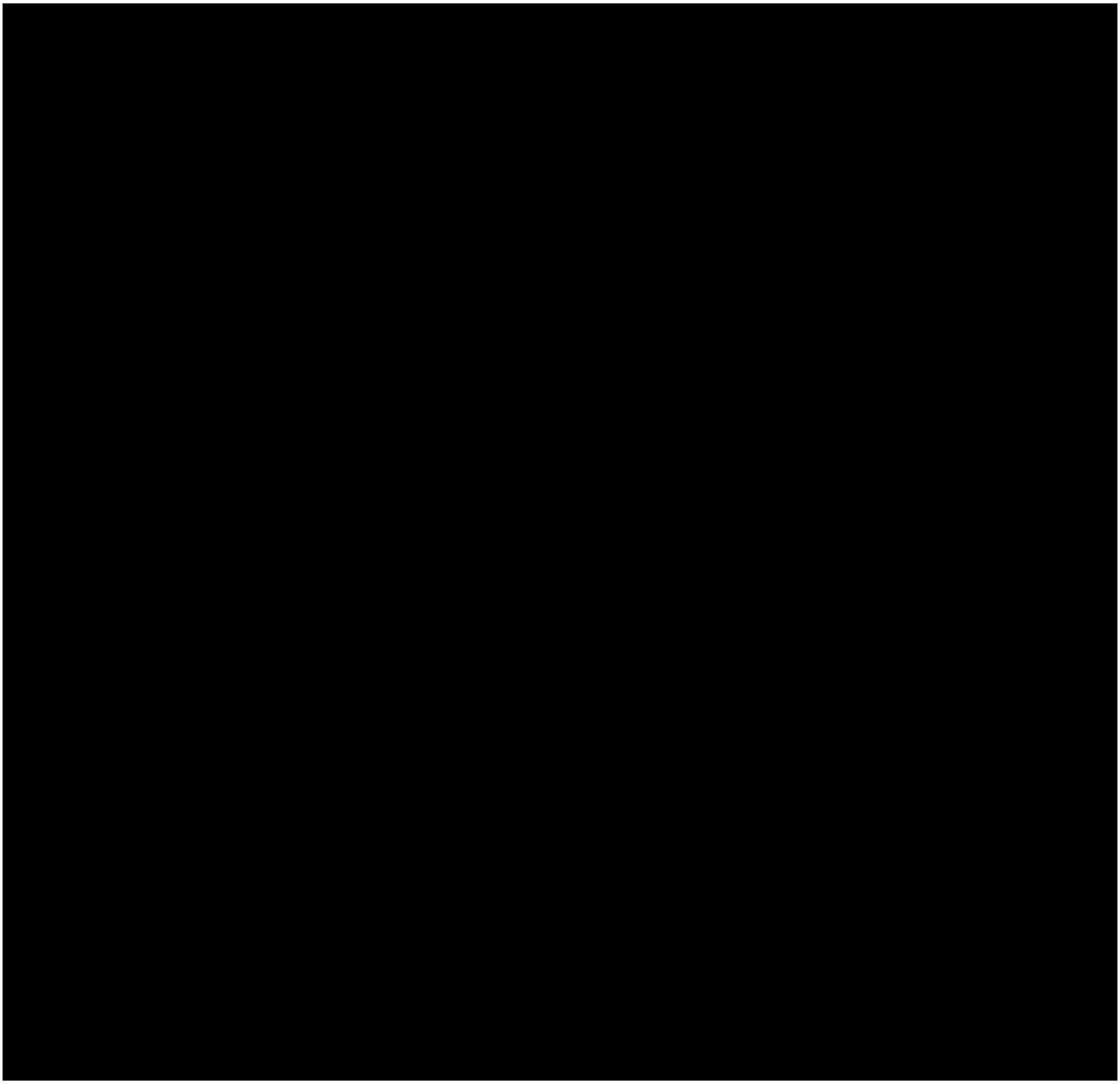
- Paragraph 453 implies that the 'theme of objection' of the moon view was not raised as part of the S&P Sephardi Community's objections to the previous application at this site. This is inaccurate, page 16 of the Bevis Marks Synagogue Significance & Community Impact Study dated 7 April 2021 and submitted as an objection to the previous application clearly states that *'In fact, a special prayer (kiddush lebana) is recited each month upon only seeing the moon in the night sky, something we won't be able to do if buildings block out our views of the eastern and southern sky)'*. It is true that the objection relating to the moon view is more clearly articulated in relation to the present application; this is not a reason to downplay its importance, but instead a reason to pay closer attention.
- Paragraph 461 refers to a third-party review of the applicant's daylight/sunlight assessments. We have not been provided with a copy of this third-party review and it does not appear to be available on the planning register. We again request a copy of this document.
- Paragraph 1104 refers to a third-party review of the S&P Sephardi Community's independent daylight report. We note that this has now been uploaded to the planning register and is dated 9th December 2024, yet is summarised in the Officer's Report which was made public on Thursday 5th December. We note that we have not previously been provided with a copy of this report or had the opportunity to respond.
- As set out in the report we have submitted three letters of objection to date. However our second letter of objection dated 15th November 2024 does not appear to be included within the appendices/supporting documents presented to Members.

We look forward to your response on the matters raised above.

Yours sincerely,

[redacted]

Roger Hepher
Executive Director



From: Shahida Victor [redacted]
Sent: 29 November 2024 7:19 PM
To: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: 24/00021/FULEIA —Supporting Representation

You don't often get email from shahida.victor@greenhousesports.org. Learn why this is important

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

I am writing to share my support for the planning application for Holland House(24/00021/ FULEIA and 24/00011/LBC).
Having connected with the team at Bury Street and after hearing about their proposals to establish a community hub at Holland House, I believe there is a wonderful opportunity to establish a truly inclusive community which breaks down barriers currently dividing people of different backgrounds.

My post code is NW1 5NS and I wish to ensure that my support for the above application is captured.

Yours sincerely,
Shahida Victor

Shahida Victor
Community Relationships Lead
Tel: [redacted]

greenhouse sports

www.greenhousesports.org



Stay up to date with Greenhouse Sports news and events

We've updated our privacy policy. Find the full policy at greenhousesports.org/privacy

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Historic Buildings
London and Middlesex Archaeological Society

Ms Anna Tastsoglou, Principal Planning Officer,
Environment Department
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

26 March 2024

Dear Ms Tastsoglou,

Re: Bury House, 31 Bury Street, EC31 5AR
Full Planning Permission reference: 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and
Listed Building Consent: 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

The planning application 24/00021/FULEIA and associated application for listed building consent 24/00011/LBC includes for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; erection of four storey extension resulting in ground plus 8 storeys at Holland House; and a three storey extension resulting in ground plus 5 storeys at Renown House.

The LAMAS Historic Buildings Committee **object** to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.

24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street)
We have written on two previous occasions in 2021 expressing our objections to the planning applications submitted for 20/00848/FULEIA Bury House, 31 Bury Street, London, EC3A 5AR. As you will know, this scheme was subsequently refused in June 2022, with the reason cited as:

1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal).

2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site, as highlighted by Historic England in their letter of objection.

The City of London Local Plan January 2015; Policy DM 12.2 Development in conservation areas identifies that: *Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.*

Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area.

24/00011/LBC (Holland House 1 - 4, 32 Bury Street)
Holland House is a Grade II* listed building first listed in June 1972 and amended in September 1997. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys.

The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: *To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.*

Policy DM 12.2 Development in conservation areas, para 3.12.10 further identifies that: *In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale,*

Policy DM 12.3 Listed buildings states:

1. *To resist the demolition of listed buildings.*

2. *To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.*

Para 3.12.14 further identifies that: *Where extensions are proposed, in order to be acceptable, they should be located where they minimise the effect on the listed building concerned, and should always be appropriate in scale and character. The bulk, height, location and materials of roof extensions will be particularly critical and should be appropriate to the period and style of the building and its setting.*

This has been reinforced by the establishment of the Creechurch conservation area, which encompasses both the Grade II* Holland House and the Grade I listed Bevis Marks synagogue.

The application 24/00021/FULEIA for the demolition of Bury House and erection of a new building is, in our opinion, materially of little difference to the previous 2020 scheme. The committee therefore still remain of the opinion that:

1. The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will still profoundly harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings. The reason as stated in paragraph one of the letter of rejection therefore still relates .
2. Whilst it is acknowledged that the proposed building has a slightly amended profile, we do not consider that this provides sufficient mitigation to change the less than substantial harm on the London View Management Framework view as stated in paragraph two of the letter of rejection.

The application for listed building consent 24/00011/LBC for the partial demolition of the Grade II* Holland House and the construction of four further storeys would cause a significant detrimental effect on the Grade II* listed building, in contravention of Policy DM 12.3 Para 3.12.14

The proposed development is within the Creechurch conservation area, and in the opinion of the committee, will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2.

For the reasons set out above, the LAMAS Historic Buildings Committee therefore continue to object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.

Yours sincerely,

Vicki Fox (Hon. Secretary)
LAMAS – Historic Buildings & Conservation Committee

THE ROYAL PARKS

Anna Tastsoglou
Principal Planning Officer
Environment Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

10 April 2024

Dear Anna Tastsoglou,

RE: Planning Application: 24/00021/FULEIA
Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works

Thank you for providing The Royal Parks (TRP) the opportunity to comment on the above-mentioned planning application.

The Royal Parks is the charity responsible for managing London's Royal Parks on behalf of the Department for Culture, Media and Sport, and ultimately, the Crown. There are eight Royal Parks within Greater London covering almost 2,000 hectares. All of the Royal Parks are designated as Metropolitan Open Land (MOL) under Policy G3 of the London Plan (March 2021). MOL comprises strategic open land within the urban area that "*protects and enhances the open environment*".

THE ROYAL PARKS

The Regent's Park, Greenwich Park and St James's Park are designated heritage assets, being Grade I listed on Historic England's Register of Parks and Gardens, as well as Conservation Areas. In addition, Greenwich Park is a Special Area of Conservation and forms part of the UNESCO World Heritage Site of Maritime Greenwich, and Primrose Hill is a designated heritage asset.

One of The Royal Parks' charitable objects is to protect, conserve, maintain and care for the Royal Parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historic, horticultural, environmental and architectural importance. This includes protecting them from potential harm – notably visual harm - caused by proposed development outside the Royal Parks.

Having reviewed the Heritage Statement submitted in support of this planning application, we believe that although the development may not be visible form The Regent's Park and St James's Park, it will be visible from Greenwich Park. This includes the view from the General Wolfe statue, which is a protected view, as set out in the London Plan.

In light of our charitable objects, TRP is concerned that the additional massing of the proposed development would be detrimental to the views and visual amenity experienced by visitors to the aforementioned Royal Parks. We therefore object to this planning application and hope that our comments will be considered in your determination.

We welcome the opportunity to comment further on this matter should the need arise. Please send your correspondence to estatesandprojects@royalparks.org.uk.

Yours sincerely,

Katherine Drew
Estates Manager

[redacted]

I write as the President of the Jewish historical Society of England to object to the development at 31 Bury Street London EC1 – Application Reference 24/00021/FULEIA

The Society's members include academic historians, teachers and researchers of history, with a deep understanding of the significance of Bevis Marks Synagogue to the history of the Jews, of London, and of the UK more broadly. We also wish to make some points regarding the planning aspects:

1. We support and endorse the comments made by SAVE in their response to consultation on the proposed Creechurch Conservation Area:

   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. (SAVE Response to consultation – 1st November 2023)

2. Current City of London planning policy is not to allow tall buildings in Conservation Areas. The designation of this Conservation Area, as recently as January 2024, would therefore be rendered meaningless if the proposed development were to be granted consent. Further, it is quite clear that the proposal would be seriously harmful not only to Bevis Marks synagogue, but to other heritage assets within the Conservation Area.

3. In short, the proposed development would destroy the setting of the synagogue, overshadow the building and its courtyard, and significantly reduce its standing both nationally and locally.

4. The application is undoubtedly premature, pending adoption of the City Plan 2040, including the evaluation of locations suitable for tall buildings. This process should not be undermined by the grant of consent for a tall building in this totally unsuitable location.

5. The redevelopment of this site cannot be justified by the limited planning benefits which the developers are putting forward in support. The development would represent a clear breach of local Planning Policy, and of national policy

with regard to Conservation Areas and Heritage Assets, and the benefits offered fall far short of justifying these breaches.

6. We therefore respectfully request that permission is REFUSED.

We look forward to hearing from you.

Miri Rubin

President of the Jewish Historical Society of England

[redacted]

PLANNING APPLICATION (24/00021/FULEIA) - OBJECTION
BURY HOUSE, 31 BURY STREET

From:
PNatali
14LeasideAvenue
London
N103BU

Date: 2 April 2024

Application Reference:	24/00021/FULEIA
Address:	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal:	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Case Officer:	Anna Tastsoglou

I object to this planning application (24/00021/FULEIA) at Bury House, 31 Bury Street.

I have previously objected to a similar application (20/00848/FULEIA) on the same site.

The previous application (20/00848/FULEIA) was refused on 22 June 2022 by the City Corporation, in part, because "*The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality)*.".

The current application (24/00021/FULEIA) is of no greater merit than the previous, refused, application; the current application would also have an overbearing and overshadowing impact on the Synagogue and its courtyard and it would be at the expense of the Jewish community. I am therefore very concerned about the current application.

Bevis Marks is the oldest continually functioning Synagogue in the UK, with families able to trace their roots back to the early days of the community in the 17th century. It is an important part of this country's multi-faith heritage and is an active and vibrant Synagogue and community. It is a pity that the wannabe developer is seeking to obtain planning consent for a scheme that will be detrimental to the Synagogue, its community and its wider place in Britain's heritage.

My objections to the current proposals are many and include, in part, the following:

- The proposed 45 storey tower would completely overwhelm the Grade 1 Listed Synagogue building, which is of enormous historic and cultural significance.
- The proposed tower would overshadow the Synagogue and its courtyard for much of the day. It would further reduce the already minimal daylight that penetrates into the Synagogue, making it even more difficult to conduct worship. It would also reduce the ability for the Synagogue's courtyard to be used for rituals and celebrations.
- Although the wannabe developer's Design and Access Statement sets out (at 5.4a3) that the current proposals include a height reduction from the previous proposals such that, it is claimed "*The height reduction and stepped form of the upper sections are purposely designed to minimise any adverse impact to views from the [Synagogue's] courtyard*", this is disingenuous as the wannabe developer is incorrect *viz* in order to minimise any adverse impact to views from the Synagogue's courtyard there should be NO new development visible from the Synagogue's courtyard. (See also comments concerning light above.)
- Irrespective of any qualities of design or sustainability, a building of the size and scale proposed is simply inappropriate to be built so close to a Grade 1 Listed Synagogue building; a similar approach would not be permitted adjacent to St Paul's Cathedral and there is no good reason for such an approach to be acceptable adjacent to Bevis Marks Synagogue.
- The City of London's heritage, and the Jewish community's centuries old ability to worship at the Synagogue, should not suffer at the expense of alleged benefits that the wannabe developer contends might become available elsewhere in the area. Britain's Jewish community and its heritage do matter and must be preserved.
- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict between the proposed development and the statutory development plan. The City Corporation would be disingenuous were it, on the one hand, to create the Creechurch Conservation Area and, on the other hand, to remove the very restrictions pertaining to the Creechurch Conservation Area that benefit the Synagogue and its setting.

I request that the City Corporation rejects the proposed development.

Thank you for your attention.

Time Central
32 Gallowgate
Newcastle upon Tyne
Tyne and Wear
NE1 4BF

UK Director - Jo Lindley
jo@britishamericanproject.org
www.britishamericanproject.org

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

15th March 2024

Dear Anna,

I am writing on behalf of the British American Project in support of WELPUT's proposals for the future development of Bury House, Holland House, and Renown House - planning application reference 24/00021/FULEIA.

The British-American Project (BAP) hosted a series of meetings at Holland House in 2023 in order to recruit new Fellows into our Transatlantic Leadership network. In total, we held seven meetings with roughly 50 participants, including many prospective new members, over the course of four days and all went flawlessly.

Making a strong first impression to these prospective members was important to us and Holland House delivered! Candidates and BAP Fellows alike all commented on such a beautiful and historic setting. The central London city location and professional boardroom setting was perfect for our needs. On one occasion, a meeting attendee was able to join virtually via Zoom and the availability of A/V facilities was also greatly appreciated.

As a mostly self-funded, value-led non-profit organisation, we are always looking for ways to conserve our scarce funds and finding suitable, affordable meeting space in London has been a constant challenge. Holland House is ideally situated to address this need with a central location, easy transport links, professional meeting rooms and lobby areas, and additional support facilities.

I sincerely hope you'll consider the benefits that organisations like BAP will gain through the continued use of Holland House when you are determining this WELPUT's application.

Best regards,

Calvin Tarlton
BAP UK Selections Chair

UK Advisory Board
Martin Vander Weyer (Chair), Rushnara Ali (Deputy Chair)
Nicolas Maclean, Andrew Wyllie, Jane Hill, Karen McHugh, Bela Arora, Rob Beckley, Dan Fitz,
Sir John Sawers, Ben Okri, Justine Lancaster, Lela Kogbara, Jill Black, John Baines

EAST LONDON COMMUNITY BAND

Together in music

25 March 2024

Dear Ms Tastoglou,

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

I am writing on behalf of East London Community Band in support of the planning application being brought forward by WELPUT for the redevelopment of Bury House, Holland House and Renown House.

ELCB is a volunteer-run charity providing music-making opportunities for musicians of all ages and abilities. When it comes to performance spaces, affordable, secular spaces are very rare; we often hold our concerts in churches or school halls, which meet our budget but are often poorly lit, inadequately heated, and not fit for purpose. There is a notable dearth of spaces in the City to rehearse and perform free of charge.

On the 29th August 2023, we were invited to tour the spaces within the historic Holland House and to have a discussion about how we could utilise these spaces in future. Following this, on the 27th October 2023 we held our first band music and community social evening on the first floor of Holland House, something which we will look to doing more in future. We currently rehearse in a former Victorian school which is only partially accessible, which is an increasing concern as some of our members have restricted mobility. It is a key objective of our organisation to make our sessions available at an accessible site. The proposed development would be especially welcome particularly as the proposals include an auditorium space in a great, central London location.

I therefore welcome the proposed application in principle and hope the that the City of London Corporation will approve the proposals, which I hope will make a positive contribution to the long-term cultural success of the City.

Kind regards

Suzanne Gorman
Chair

Charity no 1142255 | Registered address 8 Maria Terrace London E1 4NE | 020 7790 8034
info@eastlondoncommunityband.co.uk | www.eastlondoncommunityband.co.uk



SAPPHIRE
EMPLOYABILITY & WELLBEING ACADEMY LTD

Sapphire Community Group

Anna Tastoglou
City of London Corporation
Department of Planning and Transportation
PO Box 270
Guildhall
London
EC2P EJ

25/03/2024
(24/00021/FULEIA)

Dear Ms Tastoglo,

I am writing on behalf of The Sapphire Employability and Wellbeing Academy in support of the redevelopment of Holland House.

Sapphire was opened in 2015 to help support families and individuals ages 5- 35 years old with all things related to employability and wellbeing such as housing support , food support , CV workshops, employment , and general work within the community to help benefit their day to day lives.

Places like Holland house let us continue our work in the community offering a free space where we can get together face to face and be comfortable within the space. Approving this will benefit not only the community but the charities that use the space.

At Sapphire we support the application which we can see being an incredible space where we can continue to support our young people.

Kind regards.

REGISTERED POSTAL ADRESS

The Sapphire Employability and Wellbeing Academy
The Universal Building, 4th Floor
364-366 Kensington High Street
London W14 8NS

E: info@sapphirecommunity.org
W: https://www.sapphirecommunity.org/

OFFICES
KENSINGTON: The Sapphire Employability and Wellbeing Academy The Universal Building, 4th Floor 364-366 Kensington High Street London W14 8NS
Company House No 14828368
Charity Registered 1193377 (England & Wales)

St Barnabas' CE Primary School & Nursery

St Barnabas Street, London. SW1W 8PF
Executive Headteacher: Mrs Sarah Maltese
Head of School: Miss Lauren Castle
www.stbarnabasprimary.org.uk
office@stbarnabasprimary.org.uk
020 7186 0152

Anna Tastoglou
City of London Corporation
Department of Planning and Transportation
PO Box 270
Guildhall
London
EC2P EJ

14 March 2024

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

Dear Ms Tastoglou,

I am writing on behalf of St Barnabas Primary Schools in support of the planning applications being brought forward by WELPUT for the redevelopment of Bury House, Holland House and Renown House.

The Learning Crowd invited us to attend a facilitated workshop for our year 6 students on the 21st June within the historic Holland House. The opportunity for the children to experience a different part of the City we feel it really helped to open their eyes to the world of work in an area which some may have felt was not open to them. The spaces within Holland House are unique and knowing we have such an impressive building within reasonably close proximity of St Barnabas - with spaces which we can use - is very exciting both for us as teachers and for our students.

Spaces such as Holland House do not become available very often, and the Applicant's approach, opening this up for members of the public to visit alongside providing workspace for schools and other educational charities, is to be applauded. The children have all passed on their feedback and the workshops we took part in were a real success! We will absolutely take advantage of the offer again in future.

We therefore support the application in principle, which I believe will make a positive contribution to the long-term economic success of this part of the city.

Kind Regards,

Lauren Castle
Head of School

StageTEXT

Stagetext, Mercury Theatre, Balkerne Gate,
Colchester, CO1 1PT
T: +44 (0)20 73770540 | E: enquiries@stagetext.org
www.stagetext.org

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

Dear Anna,

I trust this message finds you well. I am writing regarding the planning application for Bury House, Holland House and Renown House (Planning application reference number: 24/00021/FULEIA).

Stagetext are a charity working for deaf access in the arts. We have a registered office in Colchester, but our staff work remotely and are based across the south of England. Earlier this year, Holland House generously allowed us to use their space, to deliver a training session, and for a team building day. This accessible and economic space was invaluable to us as a small organisation spread across a large geographic area.

Looking ahead, we are keen to develop our relationship with Holland House, and look forward to using the space again to support access in the arts, as well as our own team building and cohesion, which is fundamental for our continued success.

The planned development of Holland House would be incredibly useful for us in terms of connecting with local organisations and supporting Holland House with the accessibility of their plays and art exhibitions.

Thank you for considering our input. Please do not hesitate to reach out if you require further information, or if there is anything else we can do for you.

Warm regards,

Oliver Webster – [redacted]
Head of Systems and Services
Stagetext

Dr Lee Hudson
Population, Policy and Practice
UCL Great Ormond Street Institute of Child Health
30 Guilford Street
London WC1N 1EH

20th March 2024

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

Dear Anna Tastsoglou,

Subject: Letter of support for planning application reference number 24/00021/FULEIA

I am writing to express support for WELPUT applications to redevelop key locations. I was fortunate to be able to use one of these spaces to convene a meeting for my research team within UCL's Population, Policy and Practice Research and Teaching Department at UCL Great Ormond Street Institute of Child Health. We met on 15th December 2023 with 11 team members, using the Boardroom space at Holland House. I am grateful to the team for their kind offer to host us and for all their help in coordinating with us to host this event.

Our research team primarily focusses on addressing urgent issues in relation to children and young people's health and wellbeing and can directly impact policy and practice in key fields. Affordable spaces in a central location are rarely available to academic research teams, with limited funding outside of direct research activities, therefore this was a rare and unique opportunity to gather like-minded colleagues; to reflect as a team on our research findings and discuss future directions. This time was also utilized by UCL students to present and be supported, providing valuable experience to researchers just starting out in their career. The environment and welcoming of a setting is well established as an influence on the way people think, behave and can contribute and perform intellectually. How lucky we were to have this opportunity which helped across those domains. Further, bringing people into the city contributes both ways to the vitality and the excellence of this great City. My PhD students who are on relative low incomes really enjoyed it – and it certainly inspired.

Such spaces will be hugely impactful for future research endeavours, providing a space and opportunities to meet with key stakeholders, connect with researchers from other organisations and convene events to share project findings and generate impact.

We look forward to continuing to use Holland House in 2024, as well as following restoration of the beautiful heritage building.

Sincerely,

Dr Lee D Hudson

Clinical Associate Professor | *GOS UCL Institute of Child Health*
Consultant Paediatrician | *Great Ormond Street Hospital*
Lead Child and Family Health | *UCL Medical School*

Samantha Riella,

University of Liverpool Management School,

Chatham St,

Liverpool,

L69 7ZH

Anna Tastsoglou, Principal Planning Officer

Environmental Department

City of London

Guildhall

London, EC2V 7HH

15 March 2024

Dear Ms. Tastsoglou

On behalf of the University of Liverpool Alumni Team, I would like to share my support for the proposals being brought forward by WELPUT (application reference 24/00021/FULEIA).

In September 2023, we were thrilled to host 'Getting Ahead London' at Holland House. For our event, we utilized several spaces within the beautiful, historic building to accommodate our students, graduates, and alumni speakers, totalling approximately 26 attendees. We used two of the seminar style rooms, kitchen, reception, and boardroom, which were all spacious areas that hosted our panel sessions and networking area, where our attendees had the opportunity to connect and share experiences.

The feedback we received from our attendees was extremely positive with many commenting on the comfortable facilities and the convenient, central location opposite the Gherkin.

Looking ahead, we hope to continue using Holland House, both in the short term and following restoration of Holland House, and delivery of the wider scheme. We are excited about WELPUT's proposals for the Site and the proposed new affordable and accessible spaces which will attract more education providers like ours, to the heart of the City.

Sincerely,

Samantha Riella

Alumni Engagement Officer

University of Liverpool Management School

Brent, Wandsworth and Westminster mind

Anna Tastsoglou, Principal Planning Officer (Development Management)
Environment Department
City of London
Guildhall
London
EC2V 7HH
19/04/2024

Dear Ms Tastoglou,

I am writing to express our support for the planning application (reference number 24/00021/FULEIA) for the redevelopment of Bury house, Holland house and Renown house which includes the cultural strategy around supporting the local community; schools and charities.

We at Mind in Brent, Wandsworth, and Westminster believe that Holland House has proven to be an exceptional venue for events, offering a conducive and versatile environment for different types of gatherings. We are confident that by considering Holland House as an alternative venue, Mind in Brent, Wandsworth, and Westminster can optimise our initiatives in the following areas:

- **Board Meetings:** Holland House provides a professional and tranquil setting, fostering an atmosphere conducive to strategic discussions and decision-making.
- **Team Away Days:** The surroundings of Holland House offer an ideal escape from the daily routine, promoting team building, collaboration, and creative thinking among staff members.
- **In-House Staff Training Sessions:** The facilities at Holland House can accommodate various training needs, providing a comfortable and focused environment for staff development.
- **External Corporate Training Programmes:** The versatile spaces available at Holland House are well-suited for hosting external corporate training programmes, including our specialised offerings like Mental Health First Aid.
- **Community Events:** Holland House offers a welcoming and inclusive space for hosting community events, such as art exhibitions and film screenings, allowing Mind in Brent, Wandsworth, and Westminster to engage with the local community in a meaningful way.

We are enthusiastic about the prospect of seeing Holland House become an additional space that we can use for the important work carried out by Mind in Brent, Wandsworth, and Westminster.

Yours sincerely,
Tom Acres
Community Lead – Brent & Westminster

Brent, Wandsworth and Westminster Mind
23 Monck Street | London | SW1P 2AE
020 7259 8100 | hello@bwwmind.org.uk | bwwmind.org.uk

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Begum, Shupi

From: [redacted]
Sent: 01 May 2024 15:04
To: PLN - Comments
Subject: Letter of objection to planning application 24/00021/FULEIA and listed building consent 24/00021/LBC

THIS IS AN EXTERNAL EMAIL

Dear members of the City of London Planning Committee

My apologies: I forgot to add my address. I have now done so.

Best wishes

Malcolm Torry

From: [redacted]
Sent: Wednesday, April 24, 2024 8:47 PM
To: 'PLNComments@cityoflondon.gov.uk' <PLNComments@cityoflondon.gov.uk>
Subject: Letter of objection to planning application 24/00021/FULEIA

To members of the City of London Planning Committee

Wednesday the 24th of April 2024

Planning application 24/00021/FULEIA and listed building consent 24/00011/LBC

I am writing to object to the proposed new building and extensions of buildings that are the subject of planning application no. 24/00021/FULEIA and listed building consent 24/00011/LBC.

Last Thursday, the 18th of April, Rabbi Morris of the Bevis Marks Synagogue was invited to attend the City Deanery Clergy Chapter to tell us about the planning application for a 44 storey office block just a few metres from the synagogue. He explained that a very similar application had previously been rejected by the Planning Committee; that a Conservation Area had been proposed, but that the site of Bury House had been omitted from it; and that when that site was then included in the Conservation Area (which unusually still seems to permit new tall buildings) the new City Plan document relating to the Bevis Marks Synagogue's 'immediate setting' (document ED-HTB29) did not include the site of Bury House, which is where the 44 storey block would be built: a tall building that would substantially impact the synagogue and so should surely be included in the immediate setting—which would in turn suggest that the planning application should be rejected. I notice that the buildings adjacent to Bury House have also been omitted from the 'immediate setting', yet the planning application proposes adding additional floors to these, which would also substantially impact the synagogue, suggesting that these buildings too should be included in the immediate setting—which would again suggest that the planning application should be rejected.

As I was listening to Rabbi Morris at that meeting I could not help drawing the conclusion that the property developer that has submitted the planning application might have achieved a substantial level of influence in the City of London Corporation. I had no evidence that this was the case, but my long experience of relationships between local authorities and property developers during eighteen years as Rector of the parish that includes the Greenwich Peninsula suggests that that could be a possible explanation for the initial Conservation Area plan omitting the site of the planning application, and for the Immediate Setting of the synagogue omitting the same site. Clearly an investigation is required to ensure that the developer has not been able to exert undue influence on the City of London Corporation before any decision is taken about the planning application.

This morning I visited the synagogue and explored the surrounding streets. It was immediately clear to me that to locate a 44 storey building on the site of Bury House, and to add additional floors to adjacent buildings, would, in the context of existing tall buildings, completely hem in the synagogue and remove most of its natural light. This unique synagogue, a Grade I building that has been in constant use by the Jewish community for over three hundred years, and that unusually for a historic City building has its original interior intact, would experience significant harm, as would the community that uses it.

I understood from Rabbi Morris that the developer has offered space for community use in the buildings that it now owns. What it might have failed to realise is that temporary community benefit can never substitute for permanent community and heritage harm, which is what it is planning to inflict on London's Jewish community and on its synagogue: an unconscionable thing to do, particularly at such a complex and difficult time for London's Jewish community.

Please, for the sake of the City's heritage, and for the sake of its Jewish community, reject this planning application; forbid the building of new tall buildings in conservation areas; and do all you can to protect the precious heritage that the City of London Corporation holds in trust for London and its people.

Yours sincerely

Malcolm Torry

The Rev'd Dr Malcolm Torry, Priest in Charge, St Mary Abchurch

St Mary Abchurch, Abchurch Lane, London EC4N 7BA

Foundation for Jewish Heritage

20 Neeld Crescent
London NW4 3RR
United Kingdom
[redacted]

info@foundationforjewishheritage.com
www.foundationforjewishheritage.com

Ms Anna Tastsoglou
Principal Planning Officer, Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

13.05.24

Dear Ms Tastsoglou

RE: Planning Application: 24/00021/FULEIA
Address: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

I am writing to register the Foundation for Jewish Heritage's **strong objection** to the above application. Our objection relates to the negative impact that the proposed development would have on the Grade I listed Bevis Marks Synagogue (NHLE List Entry Number: 1064745). Bevis Marks is the oldest surviving synagogue in the UK and is arguably the most important Jewish heritage site in the country. The Synagogue is of exceptional significance both to the UK's Jewish community and in the history of the City of London, in which Sephardic Jews played a pivotal role.

In respect of the previous application, our trustee Esther Robinson Wild wrote a comprehensive objection dated 01.02.21. All of the points made in this document apply to the new application.

In addition, we would like to make the following points in support of our objection to the new application:

1. The alterations made to the proposal since the previous application **do not address the grounds on which it was refused,** including the unacceptable impact on the Synagogue. We welcomed the planning committee's refusal of the previous application and can see no reason for this decision to be undone by the new application. Indeed, the subsequent creation of the Creechurch Conservation Area and the widening of the new proposal's footprint strengthen the case for refusal.

2. The Foundation's previous objection stated that we expected a robust and thorough assessment of the significance of a Grade I listed heritage asset which may be impacted by a major development of this nature and that we were concerned by the absence of such. We remain concerned that **no such assessment has been adequately carried out.**

   The Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment submitted with this application includes a single page heritage assessment devoted specifically to Bevis Marks Synagogue (sections 8.124-8.139). It includes no attempt to assess the evidential or communal significance of the site, points raised in our previous objection. The assessment is incomplete and inadequate for a Grade I listed site of outstanding historical interest.

Trustees
David Bearman
The Lord Finkelstein OBE
Stephen Goldman
Dame Helen Hyde DBE
Prof. David Latchman CBE
The Rt. Hon. Jim Murphy
Daniel Peltz OBE
Esther Robinson Wild
Stuart Roden
Sir Simon Schama CBE
Simon Sebag Montefiore

Chief Executive
Michael Mail

Friends
Anne Applebaum
Father Patrick Desbois
Gunter Demnig
Taco Dibbits
The Lord Fellowes
Colette Flesch
Stephen Fry
Sir Nicholas Hytner
Steven Isserlis CBE
Sir Anish Kapoor CBE
Sarah de Lencquesaing
Bernard-Henri Levy
Daniel Libeskind
James E. Lieber
Senator Joseph I. Lieberman
Hadassah Lieberman
Janusz Makuch
The Rt. Hon. Sir Eric Pickles MP
Steven Pinker
Taleb D. Rifai
The Rt. Hon. Sir Malcolm Rifkind
Olivier de Rohan Chabot
The Lord Sassoon
Timothy Snyder
Edmund de Waal OBE
Jimmy Wales
Debbie Wiseman MBE
The Rt. Hon. Lord Young CH

Foundation for Jewish Heritage
Reg. Charity No: 1162111

We again call for a thorough Statement of Significance for Bevis Marks Synagogue to be prepared along with a robust assessment of potential harms to significance caused by the proposed development.

3. We fundamentally disagree with the assumption of the heritage assessment that the setting of Bevis Marks Synagogue makes no contribution to its significance, and that therefore the proposed development would result in 'no harm' to significance. We fully support Historic England's position that the setting does in fact contribute to the significance of the Synagogue. We believe that the proposed development will cause **substantial harm to the setting of Bevis Marks Synagogue.**

4. The proposed development sits within the Creechurch Conservation Area, which was created in part to achieve '*Fuller recognition of the Jewish history of the locality*' (Creechurch Conservation Area Proposal, City of London Corporation, December 2023). The application must be determined in accordance with the City of London Local Plan 2015. Core Strategic Policy CS14: Tall Buildings clearly states that the City will **refuse planning permission for tall buildings in conservation areas.**

   The proposed development would contravene both CS14 and DM12.2 which states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

5. The proposed development would mean that the Synagogue's courtyard would be **overlooked to an unacceptable extent**. The visualisation of the view from the courtyard submitted with the proposal (Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment, View 45a proposed, pp211-212) shows how there would be views into the courtyard from the majority of floors of the proposed Bury House.

   The Synagogue courtyard was designed as a **secluded, peaceful and private space for spiritual practice.** and has been used in this way for three centuries. The overlooking of the courtyard would represent a very substantial change to the privacy and intended atmosphere of the space.

   While we agree with the Environmental Statement that the change to the view from and into the courtyard will be 'large', we **strongly disagree** with the assessment of the view as being of only 'medium' sensitivity, and find it difficult to understand the conclusion that the effect would be 'moderate' and 'beneficial'.

6. The Foundation for Jewish Heritage is concerned with the conservation of Jewish built heritage. It is not a religious organisation; therefore we defer to the congregation of Bevis Marks Synagogue in assessing the impact of the proposal on their religious practice. We fully support the congregation's position that the proposed development would have a **serious, negative impact on their ability to carry out religious rituals.**

We hope that the reasons for our objection will considered in your determination and would welcome the opportunity to provide further comments if needed.

Yours sincerely,



Katherine Findlay
Projects Officer

To: City of London Planning Department 11th May 2024

P.O. Box 270, Guildhall, London, EC2P 2EJ.

Email: anna.tastsoglou@cityoflondon.gov.uk

Dear Anna,

Re: Planning Application Reference: 24/00021/FULEIA.

I have delayed my response to this Planning Application as it is so inappropriate and in such conflict with its surroundings that I was hoping that the applicant would see sense and withdraw this ridiculous application. Disappointingly as this is not the case, I would firstly draw your attention to the fact that this application is no better in its negative impact than the last application by this applicant, refused only two years ago by the City. The reasons for that refusal are abundantly clear and just as relevant to this current application.

Consequently, I write to object in the strongest terms to the application for the proposed redevelopment of 31 Bury Street ("the Scheme"). The construction of a 45-storey tower on this site will cause wholly unacceptable "substantial" harm to the neighbouring Grade I listed Bevis Marks Synagogue and the Creechurch Conservation Area within which both the Synagogue and the application site now sit..

The main points of my objection and opposition to the Scheme are as follows:

The proposed 45-storey tower on this site would result in **substantial harm** both to the setting of the Grade I listed Synagogue and to the wider Creechurch Conservation Area. This tall office tower, so close to the synagogue, would both block the sky view and overshadow the Synagogue and its courtyard. The sky view is of great importance for reasons of religious ritual. Adequate daylight and sunlight are vital to enable the building (which largely relies on natural light and candles) to function as a place of worship; and to enable both the building and its courtyard to continue to support the many community activities which have been ongoing for over three centuries. **This is totally unacceptable.**

The Scheme is in direct conflict with the Statutory Development Plan. The application site is within the recently created Creechurch Conservation Area. Local Plan Policy CS14 provides that planning permission for tall buildings should be refused within inappropriate areas, which specifically includes Conservation Areas. The benefits claimed by the Developer for what is an ordinary office redevelopment, do not begin to outweigh the fundamental conflict with the Development Plan.

As noted above, the City rejected a very similar scheme at 31 Bury Street only two years ago. The Scheme makes only a modest reduction in height to 45 storeys and has a larger footprint than the previous scheme which was rejected. On a point of principle, the City must show **consistency in its decision-making** by refusing this latest scheme. The principle and desirability of consistency in planning decision-making is well established, and the City should always set an example in such matters.

To add weight to this point, since the previous Bury Street application was refused, the City has adopted the Creechurch Conservation Area. That decision, supported by the Conservation Area Appraisal, reflected the uniqueness of the Synagogue and purported to protect it and its setting. The City specifically decided that the boundary of the Conservation Area should include the Bury Street site and recognised the importance of the Synagogue's wider setting. This point was accepted by the Chairman of Planning in answer to a question from Alderman Jones at the Court of Common Council on Thursday 7th March 2024.

To approve this Scheme, in conflict with the Development Plan and these previous decisions, would be **inconsistent and undermine confidence in the planning process**.

With regard to its **Public Sector Equality Duty**, the City must consider the disproportionate negative impact this Scheme would have on 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. This point is reinforced by the strength of objections received so far.

In conclusion, to approve this scheme would be an act of vandalism and heathenism, seemingly reflecting a lack of historical, cultural and religious understanding by the Corporation, and its failure to appreciate the significance of the Synagogue as the oldest and most important Sephardi Jewish Synagogue within the UK, as well as the most important Anglo-Jewish site within the UK, which has been in continuous use as a place of worship for over 300 years.

The Jewish Community has been forced to fight repeated planning battles through no fault of its own. If the City wishes to uphold its legal duties and stand by its Jewish community it will **reject the proposal.**

It is a **matter of outrage** that the Chair of Policy, the "Political Leader" of the City, has recently declared a pecuniary interest in this development as a Director of JBP, a public affairs and lobbying company, employed on this project by the Developer. Although the Policy Chair does not sit on the Planning and Transportation Committee, he is highly influential within the Corporation, chairs the Policy and Resources Committee and is a member of the Local Plans Sub-Committee. These oversaw both the creation of the Conservation Area (which was originally intended to exclude the 31 Bury Street site, until there was overwhelming consultee rejection of that approach) and draft new City Plan (which seeks to **undermine** the importance of Bevis Marks as a historic place of worship, by **limiting its protection** only to an artificially concocted "immediate setting" - a term which is not recognised in Conservation and Planning Law - and by removing the general presumption against tall buildings in Conservation Areas).

The Corporation's international reputation hinges upon it behaving with the utmost probity, and holding itself to the highest standards. What is happening here is in danger of seriously undermining that reputation.

Yours sincerely

Sir Michael Bear

Former Lord Mayor of the City of London

!7 Cyprus Gardens

LONDON N3 1SP

Email [redacted]

Mobil

Bevis Marks Synagogue - Planning Application Ref: 24/00021/FULEIA

To the Planning Committee:

Introduction

It is only four years since a 48-storey office building was proposed about 25 metres away at 31 Bury Street. After a world-wide campaign, which I understand generated more objections that the City Corporation has previously experienced, it refused permission; primarily because of the unacceptable impact on the synagogue.

Yet here we are again. The synagogue is again under threat.

I have visited the historic Bevis Marks Synagogue as a member of The Arts Society. I was delighted to learn it is a Grade 1 listed building dating from 1701. As the first purpose-built synagogue erected in England after Jews were re-admitted by Oliver Cromwell in 1656, and being the only European synagogue building to have been continuously holding regular services for over 320 years, it is of major historical importance.

It is my understanding that the architect was Master Builder Joseph Avis, a Quaker. He and his craftsmen had worked for Sir Christopher Wren. The building thus has architectural as well as religious significance. Its age and history make Bevis Marks of major symbolic value to Jewry as does St Paul's Cathedral to the Christian community. It is important to understand that Bevis Marks is not a museum, it is a living, vibrant community which would be affected by this development if allowed.

Action

It is essential that the City Corporation, known for it environmental sensitivity, refuses the planning application (24/00021/FULEIA). Otherwise, approval of this 43-storey tower block will make a mockery of the City's 2023 listing in 'The Creechurch Conservation Area'. It would be a historical travesty.

The Development

1). It is clear that the height and bulk of this proposed 43 storey tower block will completely dwarf and overshadow Bevis Marks Synagogue - a Grade 1 building of architectural and historic interest in a Conservation Area.

2). The proposed 43 storey tower will overshadow and seriously impair forever the existing limited area of natural sky which enters the Synagogue's courtyard. Lighting is condusive and central to people who wish to pray in their place of worship. I understand that because of the historic nature of the synagogue installing additional electric lights is not feasible.

3). I understand that in 2023, the Creechurch Conservation Area was approved by the

City of London Council so as to protect Bevis Marks and the Grade 11 St. Botolp's-without-Aldgate from development.. Therefore, if the City Corporation approves this development it will be contrary to its own planning statutory development plan.

4). The developers are claiming to provide substantial planning benefits that will outweigh any harm sustained to the synagogue. Unfortunately many developers make similar claims which regrettably later are unviable once construction proceeds. If claims made by this developer cannot be guaranteed how will the Corporation prevent irrevocable damage to the Synagogue's loss of amenity and purpose? The danger is that the historic Bevis Marks could thus face a threat of closure, a tragedy for this architectural gem and precious piece of religious heritage.

It is obviously essential for the Corporation of London to resist this potential vandalism.

Yours sincerely

Stanley Gelbier, HonFFPH, MA, PhD, FDS, FCGDent FAAHD, DDPH, DHMSA

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

8th May 2024

Dear Sir/Madam,

At its meeting on 25th April 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.64 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street, London EC3A 5AR
Creechurch Conservation Area/Aldgate Ward. No Ward Club rep.
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/cafe (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

The Committee strongly objected considering that the development proposals would result in the gross overdevelopment of this site in the Creechurch Lane Conservation Area, with a significantly negative impact on the character and appearance of the immediate Conservation Area and its setting. The proposals were considered to be highly damaging to the local townscape quality in the nearby street-scene context, with harmful consequences for important listed buildings that were in close proximity. The lack of architectural quality and refinement of the proposals was noted, together with their significant negative impact on wider townscape views and heritage context of the site's City/central London location.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

[redacted]

Mrs. Julie Foxa
Secretary

[redacted]

THIS IS AN EXTERNAL EMAIL

[redacted]

[redacted]

[redacted]

[redacted]

re.: Application (24/00021/FULEIA). 31 BURY STREET

I have just discovered that you have received another application to amend the Creechurch Conservation Area and am writing again to express my great disappointment and opposition to the proposal. I cannot see any specific improvements over the previous submission. This proposal continues to be out-of-keeping with the conservation of a Grade-1 listed building, while remaining the most important Jewish site in the UK.

The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. Such a proposal would never be considered within the vicinity of St Paul's Cathedral and should certainly not be permitted just metres from British Jewry's 'Cathedral' synagogue, particularly along its sensitive southern exposure.

I urge you to refuse this application.

Thank you for your attention.

Ralph Adam

4 Isobel House,

Station Rd,

Harrow, Middx

HA1 2RX

[redacted]

[redacted]







From: [redacted]
[redacted] PLN - Comments
Subject: Comment re Planning Application 24/00021/FULEIA
Date: 21 May 2024 18:13:39

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I wish to register my objection to planning application 24/00021/FULEIA– Bury House

My comment is as follows

I am once again horrified that the proposed developers, West End of London Property Unit Trust (Welput), could even think to apply to put up this proposed large and overbearing building comprising four basement levels and ground floor plus 47 upper storeys while also increasing the height of both Holland House and Renown House as all three buildings are within 25 metres of a 323-year-old synagogue of importance and historic interest and within the Creechurch Lane Conservation Area. The existing building Bury House is just eight floors.

Bevis Marks Synagogue is the oldest Synagogue in Great Britain and is still used as an active place of worship. The Grade 1 listed, plain rectangular building of red brick with modest dressings of Portland stone and two tiers of windows is unchanged since being built in 1701. The internal fittings, some of which predate the building, include seven large brass chandeliers, which are not electric as one would expect but are still lit with real wax candles.

It is unacceptable that the proposed buildings, the largest with its 47 floors and very close proximity, will completely overshadow the two-storey synagogue in its historic courtyard setting and the Beadle's House which dates from about 1890 and has been used as the rabbi's house for some years. It has been calculated that the synagogue will be in the shadow of the proposed buildings from the early afternoon onwards.

This proposal should be greatly reduced in size in order to obtain planning permission. Should that happen, particular attention must be paid during construction to possible damage to the fabric of the synagogue by ground heave, noise during synagogue services, vibration, dust and any other such annoyances.

For the above reasons and as with the previous similar planning application I believe that the current proposed plans must not be approved as they stand.

Yours faithfully

Leon Malins

Leon Malins
88 Hartland Drive, EDGWARE HA8 8RH
[redacted]

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In the interests of the environment please do not print this email unless necessary.

From: [redacted]
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: planning application reference: 24/00021/FULEIA.
Date: 15 May 2024 06:41:10

THIS IS AN EXTERNAL EMAIL

Dear Shupi Begum,
Thank you for your email.
My name and address is as follows:
Colin Baum
19 John Spencer Square,
London
N1 2LZ
I am happy for these to be included on the planning report.
Kind Regards
Colin Baum

From: lpaburystreet [redacted]>
Sent: Tuesday, May 14, 2024 1:49 PM
To: Colin Baum [redacted]
Cc: Tastsoglou, Anna [redacted]
Subject: RE: planning application reference: 24/00021/FULEIA.
Dear Colin Baum,
Thank you for your email. I can confirm receipt of your objection.
However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.
In light of the above, please can you provide a full address?
Kind Regards

Shupi Begum
Shupi Begum
Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V 7HH
[redacted] | www.cityoflondon.gov.uk
Juliemma McLoughlin
Executive Director Environment

From: Colin Baum [redacted]
Sent: Sunday, May 5, 2024 10:46 AM
To: Tastsoglou, Anna [redacted]
Subject: planning application reference: 24/00021/FULEIA.

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam
I'm writing to express my strong opposition to the above application (24/00021/FULEIA). I am a member of the Southend on Sea Jewish community and am disappointed to see this new proposal, particularly after its refusal two years ago, and the recent adoption of the Creechurch Conservation Area. This

new application, barely changed since the last time it was submitted, is not in keeping with the conservation of a Grade-1 listed building, which is now also in a conservation area, and is the most important Jewish site in the UK. The new tower, to the synagogue's immediate south, would dominate the setting of the synagogue, block out the religiously important southern sky-view, and overshadow the synagogue and its courtyard, dwindling its remaining light. This kind of proposal would never be considered within the vicinity of St Paul's Cathedral, and should certainly not be permitted just metres from British Jewry's Cathedral synagogue, particularly along its sensitive southern exposure. I urge you to refuse this application.

Regards

Colin Baum

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Website: http://www.cityoflondon.gov.uk

Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

15 May 2024

Dear Ms Tastoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we are writing to formally object to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

The proposals will have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and an unacceptable impact upon other heritage assets in the vicinity. A previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. Put simply, the revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the applications should be refused.

Significance of Bevis Marks Synagogue

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates back to 1701 and is the oldest and most historically significant synagogue in the country, often referred to as the 'Cathedral' Synagogue due to its significance within the Jewish faith. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance. The Synagogue stands within a courtyard which functions as part of the Synagogue and is of great value to the community as a social and religious space, for gathering before and after services and for holding events.

From an artistic and architectural perspective, the Synagogue is an excellent example of a simple, non-Anglican, 17th Century place of worship. The carpentry in the interior is of a very high quality and many original features remain. It is a building of enormous and profound significance. It has been continuously in use for worship since its construction and its discreet location within a courtyard open to the sky symbolises the complex history of Jewish people in Britain. The religious experience of the building is fundamental to its overall significance, alongside its architectural and historic significance.

When considering the impacts of the proposals on Bevis Marks Synagogue, it is necessary to understand and appreciate specific Jewish historical, cultural and religious considerations, such as the spiritual significance of the sky view and of natural light within the Synagogue.

The sky view at Bevis Marks is central to a number of rituals. The Jewish Sabbath concludes at the appearance of three stars which first appear in the darkening eastern sky. The beginning of each new Jewish (lunar) month is marked by the appearance of the new moon, at which time a special prayer (*kiddush lebana*) is recited. Should the view of the eastern and southern sky be erased, a highly important dimension of the Synagogue would be lost too.

The spiritual significance of natural daylight within the Synagogue must also be understood. The reading of printed texts is intrinsic to Jewish worship and the Synagogue was originally designed to admit plentiful light for this purpose. The only artificial light sources are candles and limited electrical lighting which was installed decades ago before the building was listed. The Synagogue has already experienced a substantial reduction in natural light as a result of the construction of other buildings. Further deterioration of the natural light will have profound implications for the religious value of the Synagogue as a spiritual space and house of Jewish prayer.

A letter from Rabbi Joseph Dweck, the Senior Rabbi of the S&P Sephardi Community of the United Kingdom, is enclosed at Appendix 2 which further explains the significance of the sky view and natural light at Bevis Marks to religious services and heritage. It is within this context and recognising the unique and outstanding significance of this Grade I Listed Building that the proposed development at Bury Street must be considered.

The Proposed Development

The proposed development comprises the demolition of Bury House and construction of a 43-storey tower, the partial demolition of Holland House and Renown House and extensions to both buildings, for office, flexible retail/café and flexible community/education/cultural/amenity uses.

Although the applicants make much of the evolution of the proposal from the previous version, in essence it is little different. A reduction in height of 19m is of no consequence when the remaining height is 178.7m, and the two high-level setbacks similarly make little or no difference to the proposed building's impact.

Indeed, the new proposal is even more damaging than its failed predecessor. The site now sits within a Conservation Area, to which statutory protection applies. Furthermore, it involves substantial alteration and extension to the Grade 2* Listed Holland House, which is a very significant heritage asset in its own right.

Planning Policy Context

Planning policy at all levels seeks to protect designated heritage assets from harmful impacts of development. Section 66 of the Town and Country Planning Act 1990 (as amended) states that:

*"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or as the case may be, the Secretary of State shall have **special regard to the desirability of preserving the building or its setting** or any features of special architectural or historic interest which it possesses".*

Section 72 of the Act states that the local planning authority also has a duty to pay special attention to *"the desirability of **preserving or enhancing the character or appearance**"* of a Conservation Area.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is equally relevant. It states:

*"In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), **special attention** shall be paid to the desirability of **preserving or enhancing the character or appearance** of that area."*

Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with regard to the importance of the asset, irrespective of the level of harm. Paragraph 206 states that substantial harm to assets of the highest significance including Grade I listed buildings should be *"**wholly exceptional**"*.

Paragraph 207 of the NPPF states that:

*"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should **refuse consent**, unless it can be demonstrated that the substantial harm or total loss is **necessary** to achieve **significant public benefits** that outweigh that harm or loss'.*

Policy HC1 (Heritage Conservation and Growth) of the London Plan states that:

*"Development proposals affecting heritage assets, and their settings, should **conserve their significance**, by being sympathetic to the assets' significance and appreciation within their surroundings. The **cumulative impacts of incremental change** from development on heritage assets and their settings should also be **actively managed.**"*

National and regional policy is reflected in policies DM12.1-DM12.3 of the adopted Local Plan and policies HE1-HE3 of the emerging Local Plan. Policy CS14 of the adopted Local Plan clearly states that proposals for tall buildings within conservation areas should be refused; it seeks to:

*"allow tall buildings of world class architecture and sustainable and accessible design in **suitable locations** and to ensure that they **take full account of the character of their surroundings**, enhance the skyline and provide a high quality public realm at ground level, by:*

*[...] **Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas;** the St. Paul's Heights area, St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map."*

It is notable that since the refusal of the previous application at Bury Street, the Creechurch Conservation Area was formally designated in January 2024, which encompasses both the site at Bury Street and the Bevis Marks Synagogue. The designation of the Conservation Area and the boundary chosen sought to achieve[1]:

1. A 'core' of special architectural and historic interest;
2. Fuller recognition of the Jewish history of the locality; and
3. A coherent and logical boundary which appropriately reflects the extent of the special architectural and historic interest of the Creechurch locality.

The Corporation's original proposal to exclude the site of 31 Bury Street from the Conservation Area was withdrawn following overwhelming consultee support for the proposed Conservation Area but objection to this aspect.

Another relevant change since the refusal of the previous application at Bury Street is the progress of the emerging City Plan which is now the subject of a Regulation 19 consultation (between 18 April and 31 May 2024). Our client has previously raised concerns about elements of the draft Plan and will respond to the consultation separately. We will not go into detail on these matters in this response; however there are two particular matters of concern:

1. The 'immediate setting' of Bevis Marks Synagogue identified in the draft plan. There is no statutory or other authority for the concept of 'immediate' setting, so the existence of this policy is questionable. However, should a specific setting policy be included in the adopted plan, it should recognise the setting of the Synagogue in its entirety, and particularly the importance of the sky view, in a similar manner to how views to and from The Monument are recognised.
2. The plan proposes to drop a long-standing presumption against tall buildings in Conservation Areas (as set out in Policy CS14 of the adopted Plan).

Paragraph 48 of the NPPF states:

"Local planning authorities may give weight to relevant policies in emerging plans according to:

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

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

In this case, very limited weight should be given to the policies in the emerging Local Plan, on the basis that it is at Regulation 19 stage and has not yet been submitted for examination, and that there are significant unresolved objections from our client and other stakeholders, relating to the fundamentally important matters set out above among other issues.

[1] CCA Proposal Presented to the Planning and Transportation Committee on 12th December 2024

Impact of the Proposals on Bevis Marks Synagogue

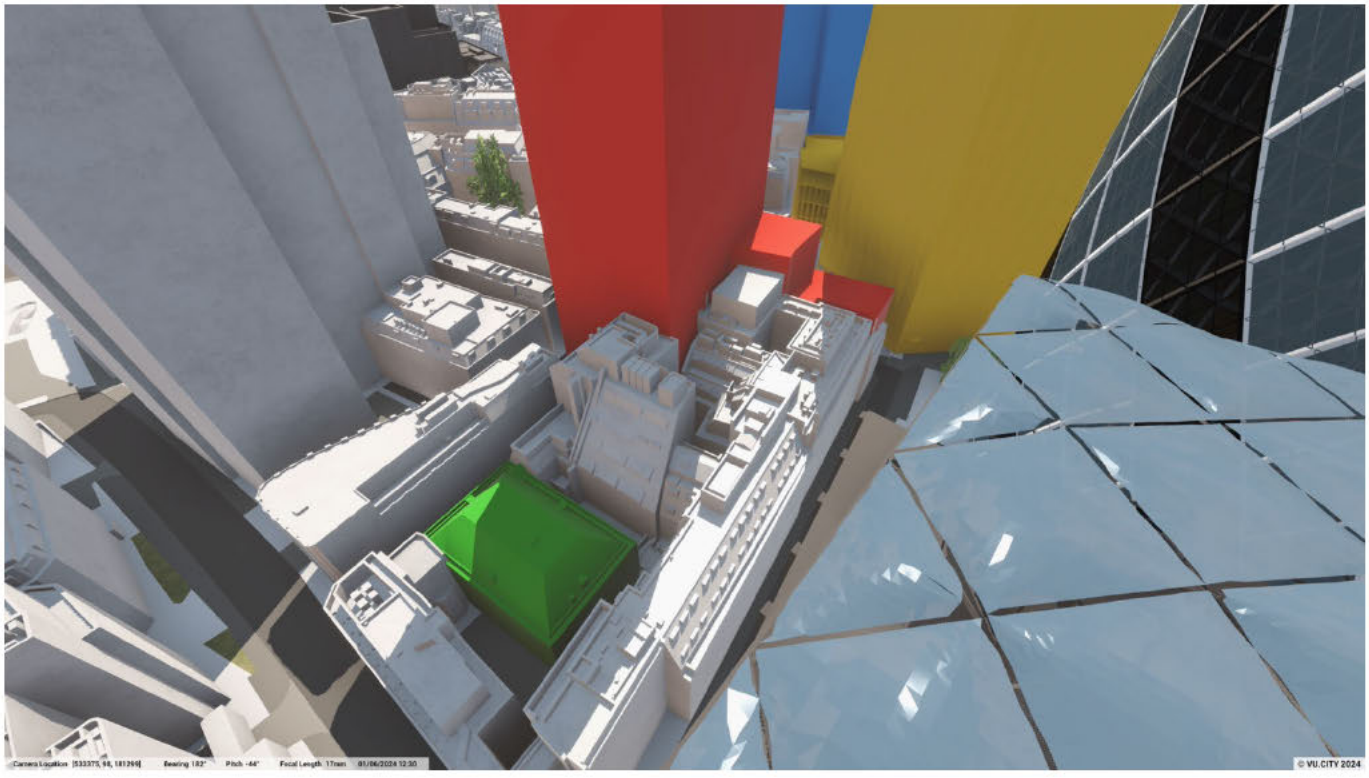
The application site is located only about 25m from Bevis Marks Synagogue at the closest point. This is shown graphically in the VuCity image reproduced as Figure 1 below.

The previous application at this site (ref. 20/00848/FULEIA) was refused on the basis of harm to the Bevis Marks Synagogue and the Tower of London. The first reason for refusal was:

"The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), [...]

Our client does not consider that the amended proposals overcome this reason for refusal. The impact of the current proposals on the Synagogue is summarised below, specifically in terms of its setting and daylight, sunlight and overshadowing.

Figure 1: VuCity Image of the Proposals (in red) - Bevis Marks Synagogue indicated in green



Heritage Impact and Setting

A Heritage Assessment of the proposed development has been prepared by Alec Forshaw, who was the author of the option three proposal for the designation of Creechurch Conservation Area (the option which was eventually endorsed by the City of London) (Appendix 1). He has a deep understanding of the local context and significant experience; in addition, he was previously the Principal Conservation and Design Officer for the neighbouring London Borough of Islington and has written widely on historical and architectural matters.

The Heritage Assessment concludes that the proposals would result in harm as follows:

- **Substantial harm** to the significance of Bevis Marks Synagogue and its setting. The report concludes that "*By reason of its height and proximity the proposed tower will overwhelm the Synagogue. The visual and psychological impact on the courtyard would be catastrophic, equally severe as the previously refused scheme*". The assessment explains that the impact on the Synagogue and its courtyard is both tangible and intangible; and that the applicant has demonstrated a lack of understanding of the significance of the Synagogue and its courtyard.
- **Substantial harm** to the character and appearance of the Creechurch Conservation Area. The report states that: "*were the proposed development to be allowed it would render the designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise*".
- **A moderately high degree of less than substantial harm** to the setting of St Katherine Cree church.
- **A moderate degree of less than substantial harm** to the setting of Grade I Listed St Botolph's.
- **A high degree of less than substantial harm** to Holland House as a result of alterations to its fabric, plan form and integrity, and the impact on its setting as a result of the proposed tower.
- **A minor degree of less than substantial harm** to the setting of Aldgate School.
- **A moderately high degree of less than substantial harm** to the setting of 2-16 Creechurch Lane.
- A serious incursion into the backdrop of the Tower of London which will cause harm to its setting.
- **A moderately high degree of less than substantial harm** to the Port of London Authority Building.
- **A moderately low degree of less than substantial harm** to the setting of 38 St Mary Axe.
- **A moderate degree of less than substantial harm** to the setting of Lloyd's Avenue Conservation Area.
- **A high degree of less than substantial harm** to Renown House as a result of the demolition of key features of the building and the impact on its setting as a result of the proposed tower.
- **A moderately high degree of less than substantial harm** to the Rabbi's House and Vestry and 2 and 4 Heneage Lane.
- **A moderately high degree of less than substantial harm** to the setting of Cree House, 18-20 Creechurch Lane, Fibi House, 22-24 Creechurch Lane, Sugar Bakers' Court, 12-14 and 27-31 Mitre Street.

The Heritage Assessment also assesses the claimed heritage benefits of the proposed development. In summary regarding the proposed benefits:

- The proposed repairs and renovations to Holland House should be regarded as routine and not a benefit (and it will suffer a high degree of less than substantial harm from the proposed works);

- The proposed reinstatement of Heneage Lane is at a different angle from the original lane and it would be gated and closed at night; the claim that this is being restored is historically inaccurate and misleading;

- The proposed reinstatement of St James Court significantly reduces the size of the existing open courtyard which sits more accurately on the original site of James Court. This causes heritage harm rather than a benefit.

Overall, the proposed development is considered to cause substantial harm to the Creechurch Conservation Area and substantial harm to the Bevis Marks Synagogue, and several cases of less than substantial harm to a range of designated and undesignated heritage assets. Cumulatively, the degree of harm is serious and must be given very great weight. The public benefits claimed by the applicant go nowhere near to outweighing the harm, and this is discussed further below.

Daylight, Sunlight and Overshadowing

A Daylight Sunlight and Overshadowing Report has been prepared by GIA and submitted on behalf of the Applicant.

Daylight

The report acknowledges at paragraph 6.8 that *'the existing baseline daylight values within the Central Room and Gallery [in Bevis Marks Synagogue] are already very low'*.

GIA has carried out a VSC assessment to demonstrate the changes to daylight at Bevis Marks Synagogue as a result of the proposed development. It initially considers the 'consented baseline', assessing the future daylight levels with surrounding consented developments built out, but without the proposed development. The report explains that when surrounding consented developments are built, the Synagogue will experience a 19.1% reduction from the existing baseline in terms of daylight to the central room, and a 20% reduction to the gallery.

When the proposed development is taken into account, the Synagogue would experience a further 10.5% reduction from the consented baseline in the central room, and a further 10% from the consented baseline in the gallery.

The GIA report says that the proposals would have a lower quantitative impact on daylight at the Synagogue than other consented developments and implies that this is of no consequence, which is misleading and downgrades the cumulative impact. However:

a) The fact that the Synagogue is already going to experience loss of daylight is not an argument in favour of the Applicant; rather, it demonstrates the need to protect the precious remaining daylight and for the current proposals to come under even greater scrutiny. If a developer proposed a polluting factory close to an area of ecological importance, no one would rationally argue that its impact on the ecological area mattered less because the habitat was already vulnerable. The very opposite is the case.

b) No account is taken of the fact that the Synagogue is illuminated primarily by natural light and by candles, or that the reading of printed scripts is fundamental to worship. This is one of the most natural light-sensitive places in London.

c) The Synagogue is simply labelled as a "religious" building, disregarding the fact that it is also the centre of a thriving community.

Sunlight and Overshadowing

The GIA report also considers overshadowing to the Synagogue courtyard. It concludes that the sunlight availability is already very limited in the courtyard, compared to what would be expected in an unobstructed open space. This is a false comparison to make in a dense urban setting like the City. It claims that already consented schemes would result in a 30-minute loss of sunlight in the courtyard on average, reducing the maximum hours to only 1.5 hours in June. The proposed development would effect a further reduction of up to 19 minutes, which it considers to be a 'marginal' reduction.

This is a glib value judgement. The fact the courtyard receives any sun makes it a valuable asset for the community uses that take place there. Losing a further 20% would undermine the benefit and utilisation of the outdoor space for that purpose.

The loss of nearly a fifth of the sunlight within the courtyard cannot rationally be considered to be of little consequence in the context of an already very low level of sunlight. Furthermore, the courtyard is treated as though it is mere circulation space, and the Synagogue is labelled only as a "religious" building. No account is taken of the fact that the courtyard space is used intensively for rituals, and for family and community activities; or that it is the only space - and indeed the original planned space - from which this remarkable heritage asset can be viewed.

Night Sky

When considering the night sky visibility, a fisheye view has been shown from three viewpoints within the courtyard; in two of these the proposed development is visible and covers part of the sky view. However, the fisheye view is not comparable to the way in which the night sky is experienced by the human eye. A more accurate view is shown in the applicant's TVIA (Figure 2 below). This shows how the proposed development would have a significant impact in blocking views of the sky from the courtyard.

None of the analysis addresses the critical religious and cultural significance of the sky view. Although very different in certain respects, there is a parallel to be drawn with Stonehenge, where the view of the sun on Midsummer's Day is essential to an understanding of the significance of this monument. Likewise, the iconic silhouette of the Taj Mahal against the sunset gives the viewer a feeling of spiritual uplift: they are no longer simply observing a fine building.

At Bevis Marks, the view of the passage of the moon across the night sky (as shown in Figure 3) is highly symbolic and intimately related to the traditions and rituals of the Synagogue, and is a most important aspect of the heritage value of the building.

Figure 2: Existing vs Proposed (cumulative) view from Bevis Marks Synagogue courtyard (Source: TVIA, The Townscape Consultancy)



Figure 3: Stills showing the passage of the moon across the sky as viewed from the courtyard



Overall, the GIA report is a typical attempt to employ technical analysis to distract the reader from the uncomfortable truth: that daylight and sunlight and the sky view are very important both to the functioning and the heritage significance of the Synagogue; that the Synagogue's daylight and sunlight is already substantially compromised; and that the proposed development would make the situation substantially worse.

Equalities

Section 149 of the Equality Act (2010) requires public authorities to have due regard to equality considerations when exercising their functions, including decision making on planning applications. An Equality Statement has been prepared by Quod and submitted on behalf of the applicant.

This Equality Statement considers the impact of the proposals on the Synagogue as a place of worship and acknowledges that the amenity of the Synagogue may be affected by the proposals, however it is said this "*would not preclude the use of these spaces for religious ceremonies*". There is no mitigation proposed.

It is considered by our client that the Equality Statement is inadequate in assessing the proposed impacts of the development on the operation of the Synagogue. A Protestant community could hold a Holy Communion service in a dark room or a disused factory. However, to do so would be strip the service of the many layers of ceremony and spectacle that make the difference between something that is a mere performance and something that carries cultural and spiritual significance. What is at stake here is the very qualities that make the Synagogue both a thriving centre of the Jewish community and the embodiment of a set of 300-year-old traditions. The author of the assessment does not demonstrate any understanding of these matters.

Not only does the Equality Statement demonstrate a lack of understanding of the impact of the proposals on the Synagogue. It implies that the impact of the proposals on the Synagogue is outweighed by other factors such as the increased provision of commercial floorspace. This may be relevant to the planning balance, but it has no place in an Equality Statement. The Statement is fundamentally flawed and certainly should not be relied upon by Officers to demonstrate their compliance with Section 149 of the Equality Act.

Planning Balance

The proposed development has been found to result in substantial harm to both Bevis Marks Synagogue and the Creechurch Conservation Area. Therefore, as per paragraph 207 of the NPPF, the application should be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve significant public benefits that outweigh that harm.

Chapter 6 of the submitted Planning Statement sets out a series of economic, social and environmental benefits which are alleged to result from the proposed development.

The PPG[2] explains that "public benefits" should be of a nature or scale to be of benefit to the public at large and not just a private benefit.

A number of the benefits claimed by the applicant. It claims that the proposed development would make a meaningful contribution to strategic policy objectives of the Eastern (City) Cluster including delivery of additional office floorspace. However, this is spurious. Policy CS14 is clear that tall buildings should not be permitted in Conservation Areas, and the policy towards the Eastern (City) Cluster (Policy CS7) is clear that tall buildings will be restricted to appropriate sites, respecting the *"conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views"*.

[2] Paragraph: 020 Reference ID: 18a-020-20190723

Other claimed "benefits" include:

- Provision of affordable workspace.
- Aspiration to achieve a BREEAM 'Outstanding' rating.
- Delivery of 619 sqm of high-quality public realm.
- Urban Greening Factor of at least 0.31.
- Delivering a building that is 28.6% more efficient in terms of overall regulated operational carbon compared to the existing individual buildings.

These are not public benefits. They are simply normal policy requirements without which no large office building would be allowed anywhere in the City. Furthermore, an "aspiration" must be viewed with scepticism.

The financial "benefits" relating to S106 and CIL payments are not public benefits either: they are payments required to mitigate the impact of the development; they should be considered as neutral within the planning balance:

- CIL payments of over £10m.
- Comprehensive S106 package including contributions to affordable housing, security and skills training.

The following claimed heritage "benefits" would in fact cause heritage harm (see above):

- Reintroduction of the historic Heneage Lane. *This would be open only between 7am and 11pm, and not on the original alignment.*
- Re-establishment of St James' Court, a new pocket park. *This would be smaller, and not on the original site.*
- Restoration of and sensitive extensions to Holland House. *Renovation is a routine responsibility and many of the proposed alterations would cause harm.*

Of the remaining claimed benefits, a number are not 'true' public benefits and should not be given weight in the planning balance:

- Public art in Heneage Arcade. *This is not 'public' but located in a privately owned arcade which is shut between the hours of 11pm to 7am.*
- Aspiration to achieve other voluntary ratings such as NABERS 5*, Active 'platinum', Wired 'platinum', and Well 'Platinum'. *Mere "aspirations" should not be taken into account.*
- Dedicated cycle repair and wellness space at lower ground floor level; operation of a social enterprise which trains young unemployed adults to service office tenants' bikes. *This cannot be said to be of a scale which would benefit the public at large, as required by the PPG. Only office tenants would be likely to benefit.*

We comment on other claimed "benefits" as follows:

- Employment opportunities during the construction (270 FTE jobs over 4.8 years) and operational phase (up to 2,470 jobs). The construction phase benefits are temporary and therefore should be afforded limited weight. *The operational jobs are capable of being achieved on many other, less sensitive, sites.*
- Replacement of obsolete office space with over 34,000sqm of new high quality office space, which will meet a specific local demand for smaller floorplates. *There is no convincing evidence that the existing building is incapable of re-use, and its demolition would in any event release embodied carbon, which is a disbenefit.*
- Delivery of a new high-quality tall building and wider transformative reimagination of an urban block. *There are many other less sensitive sites where a high quality tall building could be delivered. This urban block, which is part of a Conservation Area, does not need "transformative reimagination".*
- Significant spending of new employees on-site which would equate to between £5.8m and £7.6m annually (an increase of £4.8m to £6.7m over the existing site). *As with operational jobs, this expenditure is capable of being achieved through the redevelopment of many other, less sensitive, sites.*
- Provision of 1,176 sqm of 'community workspace' at 50% market rent for qualifying occupiers or zero rent for charities. *This is a potential public benefit, though it is unclear whether it would meet a specific need. It could also be delivered on another, less sensitive site.*
- Provision of 1,072 sqm of publicly accessible space over three floors at the 'Holland House Hub' which will be free to use for community, multi-faith, cultural and education groups. *This is a potential public benefit. It could also be delivered on another, less sensitive site.*
- Provision of 'Creechurch Hall' a 339 multi-functional auditorium space delivering a range of uses such as lectures, sports and performances, for use by office tenants as well as members of the public for free at defined times. *The use of Creechurch Hall by members of the public is a potential public benefit, though it is unclear whether it would meet a specific need and it is unclear when or how often the 'defined times' would be. It could also be delivered on another, less sensitive site.*
- Provision of small and flexible retail space at ground floor level to meet local worker, visitor and residential needs. *There is no shortage of such space within the City.*
- Off-site public realm enhancement along Bury Street. *There is no need for such enhancement within what is a Conservation Area.*
- Greater than 300% biodiversity net gain. *A sensitive re-use of the existing buildings could achieve a substantial increase in BNG.*

The Heritage Assessment at Appendix 1 identifies that the scheme will cause substantial heritage harm on two counts, to Bevis Marks Synagogue and the Creechurch Lane Conservation Area. In addition, it will cause less than substantial harm on a number of counts to a range of heritage assets. Substantial harm to even one heritage asset would require "wholly exceptional" justification under the NPPF; here, the cumulative harm is such that it is difficult to envisage the sort and scale of public benefits that would have to be generated.

The package of public benefits proposed by the applicants does not add up to anything like this level of justification. They are typical benefits which any major commercial scheme would be expected to deliver, and they are generally exaggerated. Furthermore, they are not unique to the site at Bury Street, and they could be delivered elsewhere within the City of London without causing substantial heritage harm.

The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the application should be refused.

We reserve the right to add to this objection or submit further supporting material in due course.

Yours sincerely,

Roger Hepher
Executive Director

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Appendix 1 – Heritage Assessment Prepared by Alec Forshaw

HERITAGE ASSESSMENT V3 ON BEHALF OF THE SEPHARDI COMMUNITY BEVIS MARKS
WITH REGARDS TO PROPOSED DEVELOPMENT AT BURY HOUSE, 1-4 and 31-34 BURY STREET
PLANNING APPLICATION REF: 24/00021/FULEIA
LISTED BUILDING CONSENT REF: 24/00011/LBC

SCOPE OF THIS REPORT

1. This report, prepared on behalf of the Sephardi Community Bevis Marks focusses on the heritage impacts of the proposals within the local and immediate area, including the Tower of London. It does not consider the potential impacts on long-distance or riverside views of St Paul's Cathedral. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, and to other London boroughs such as Lambeth and Southwark whose own protected local views may potentially be affected.

DESCRIPTION OF PROPOSALS

2. Planning permission is sought for: "Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7 metres AOD); partial demolition of Holland House and Renown House: restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05 metres AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49 metres AOD); interconnection of the three buildings; use of the buildings for office, flexible retail/café, and flexible community/education/cultural/amenity uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works."
3. Listed Building Consent is sought for: "Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works."
4. Overall, the scheme provides 34,584 square metres of office which includes 1,176 square metres of 'community workspace'; 1,411 square metres of flexible community/education/cultural space which includes a 339 square metre auditorium; 504

square metres of retail space; 4,794 square metres of plant and service accommodation. The total floorspace is 41,293 square metres, compared with 11,339 square metres in the existing three buildings.

BACKGROUND TO THE CURRENT PROPOSALS

5. In October 2020 an application was submitted for the demolition and redevelopment of Bury House, 31 Bury Street, for a 49 storey office tower. Despite officer recommendation for approval this application was refused by the City Corporation in June 2022, on two grounds, namely harm to the setting and amenities of the Grade 1 listed Bevis Mark Synagogue by reason of the overbearing and overshadowing impact on the courtyard of the Synagogue, and harm to the setting of the Tower of London World Heritage Site, neither of which were outweighed by public benefits.

6. Since then, the current applicant has acquired the adjoining properties of Holland House, 1-4 and 32 Bury Street, and Renown House, 33-34 Bury Street which are now included in this new application. Holland House is a statutorily listed building, and the proposals now require both planning permission and listed building consent.

7. The whole of the site has been included in the new Creechurch Conservation Area, approved by the City Corporation in December 2023 which necessarily introduces additional policy and heritage considerations to the previous scheme.

POLICIES TO PROTECT THE HISTORIC ENVIRONMENT

8. The following statutes, policies and guidance are relevant:

Planning (Listed Buildings and Conservation Areas) Act 1990

Under Section 66 (1) the Local Planning Authority has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

Under Section 72 (1) in considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Chapter 16 of National Planning Policy Framework 2023

National Planning Practice Guidance

The London Plan 2021

City of London Plan 2015

Draft New City Plan 2040 (emerging policies pre-Regulation 19)

Supplementary Planning Guidance SPDs

ASSESSMENT OF HERITAGE ASSETS AND THEIR SIGNIFICANCE

9. In order to evaluate the impact of potential development on heritage assets it is important to understand their heritage significance. The National Planning Policy Framework Annex 2 states that significance is 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 its physical presence but also from its setting. These criteria accord broadly with those set out in historic England's Conservation Principles, namely evidential, historical, aesthetic and communal.

1. DESIGNATED HERITAGE ASSETS

Creechurch Conservation Area

10. The Creechurch Conservation Area was designated by the City Corporation on 11th January 2024. The designation was subject to very widespread public consultation in 2023 which drew an unprecedented response both from the public as well as very many heritage bodies and sources of expertise.

11. Having initially proposed a very small area, which excluded 31 Bury Street, the City planning officer was persuaded that other options should be consulted upon. A larger area (Option 3) was adopted in line with the great majority of public opinion. It was concluded in the Creechurch Conservation Area Proposal Report December 2023 that this would achieve (1) A 'core' of special architectural and historic interest (2) Fuller recognition of the Jewish history of the locality (3) A coherent and logical boundary which appropriately reflects the extent of the special architectural and historic interest of the Creechurch locality

12. The Report also states that 31 Bury Street is "instrumental in defining the end of Heneage Lane, is physically attached to the Grade II* listed Holland House and makes a more coherent boundary at this point of the Conservation Area". The whole of the application site, including 31 Bury Street, lies within the new Conservation Area. A Management Plan is in the process of preparation but has not yet been subject to public consultation.

13. The City Planning officer's designation report in January 2024 noted the special architectural and historic interest of the area, "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."

14. It is considered that the Creechurch Conservation Area has a **HIGH** level of significance in terms of the archaeological, architectural and historic criteria set out in paragraph 9 above. The communal/cultural/artistic significance of the area is **VERY HIGH** owing to the outstanding importance of the area to the establishment, development and on-going activities of the Jewish community.

Bevis Marks Synagogue

15. Listed Grade I the Bevis Marks Synagogue is of **VERY HIGH** significance. Built in 1699-1701 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. It is a unique centre for traditional Jewish worship and ceremony and draws a large congregation from across London and beyond. It also attracts visitors from all over the world, and current development of a museum and visitor will likely greatly increase their number.

16. The courtyard of the Synagogue is extremely important to its heritage significance, a matter that is under-appreciated by the applicant. This paved space not only provides the immediate setting for the Synagogue itself (built as was required in 1699 so as not to front directly onto a street) but it also serves as an important place of assembly, congregation and ritual. Open sky views from this secluded setting are extremely important to the character and appearance of the courtyard itself, as well as to the Synagogue Building. The sky view is not just a matter of physical setting but is also of great symbolic and ritualist importance, and a major part of the intangible cultural significance of the heritage asset. The current improvement and renovation work due to be completed shortly will further enhance the appearance and accessibility of the courtyard.

St Katharine Cree

17. Listed Grade I the church of St Katharine Cree predates the Great Fire of London, and is one of the 'anchor' heritage assets in the locality. It is of **VERY HIGH** architectural, historic and archaeological significance. Its tower is an important townscape feature and is silhouetted against clear sky in views from Leadenhall Street. Its setting is an important part of its significance.

St Botolph's Aldgate

18. Listed Grade I the church of St Botolph's Aldgate possesses **VERY HIGH** architectural and historic significance. The tower and spire rise prominently from the body of the church into open clear sky and have a landmark quality. It is noted as having

Skyline Presence in the City Corporation's Protected View SPD 2012. Its setting is therefore a very important part of its significance.

Holland House

19. Listed Grade II*, Holland House is of **VERY HIGH** architectural significance, identified as one of the 'standout buildings in the locality'. It also has **HIGH** historic significance owing to the circumstances of its construction. It does not possess any special cultural or communal significance.

Aldgate (formerly Sir John Cass) School

20. Listed Grade II* as a fine example of the 'Wrennaissance' style and for internal elements of outstanding interest, including 17th and 18th century fabric from other buildings, Aldgate School has **VERY HIGH** architectural, artistic and historic significance. Located on the site of the former Priory it has **HIGH** archaeological significance. Its setting is an important part of its significance. A sense of openness is retained in the playgrounds. The building is prominent within the locality and is the focus of a number of views from surrounding streets and open spaces.

2-16 Creechurch Lane

21. Listed Grade II, these fine five-storey former tea warehouses have **HIGH** architectural and historic significance, which 'gives a typical flavour of the locality'.

Tower of London

22. One of London's four UNESCO World Heritage Sites, the Tower of London is of **VERY HIGH** significance on all four heritage interest criteria. Its setting is also of **VERY HIGH** significance, particularly views from the south and east.

Port of London Building 10 Trinity Square

23. Listed Grade II* the prominent square stepped tower is identified as a City landmark and skyline feature in the Protected Views SPD.

38 St Mary Axe

24. Listed Grade II this well-proportioned stone-faced commercial building, designed by Sir Edwin Cooper in 1922, has **HIGH** architectural significance.

Lloyd's Avenue Conservation Area

25. The Lloyd's Avenue Conservation Area, designated in 1981 and enlarged in 2007, is focussed on the Edwardian street of Lloyd's Avenue, but also extends to include buildings on the north side of Fenchurch Street. Noted for its consistent scale, architectural style and materials it has **HIGH** architectural and historic significance. Elaborate stone dormers and turrets contribute to a dramatic roofscape on Fenchurch Street. The setting of the Conservation Area is also an important part of its significance with regards to views into and out of the Conservation Area.

2. NON-DESIGNATED HERITAGE ASSETS

Renown House 33-34 Bury Street

26. Recognised in the City Planning Officer's Creechurch Conservation Area designation report for its good quality carved stone detail, making an effective contrast with Holland House and forming a strong corner to the bend in the street, Renown House has **MODERATE** architectural and historic significance

Rabbi's House and Vestry, 2 and 4 Heneage Lane

27. Sitting either side of the east elevation onto Heneage Lane of the Grade I Synagogue the red-brick 19th century Rabbi's House and the Vestry are important to the ensemble of religious buildings and have **MODERATELY HIGH** architectural, historic and cultural significance.

Cree House 18-20 Creechurch Lane; Fibi House 22-24 Creechurch Lane; Sugar Bakers' Court; 12-14 and 27-31 Mitre Street

28. A coherent group of unlisted 19th and 20th century brick-built warehouse buildings of generally four storey scale which possess good architectural detailing and proportion, and make an important contribution to the local townscape. They have **MODERATELY HIGH** architectural and historic significance.

IMPACT OF THE PROPOSAL ON HERITAGE ASSETS

Creechurch Conservation Area

29. The proposed scale of development will have a very harmful impact on the character and appearance of the Conservation Area. The planning officer's designation report notes that the existing 31 Bury Street forms the corner with Creechurch Lane and is important in

framing Heneage Lane. Similarly, the height, mass and scale of other post-war buildings in the Conservation Area, such as 33 Creechurch Lane, 5-10 Bury Street, 32-40 Mitre Street, 10-16 Bevis Marks, 71-77, 78-79 and 80 Leadenhall Street and Cunard House are considered to be sympathetic to their context. All these buildings, despite having no particular architectural merit, are noted for maintaining the historic building line and the prevailing scale of street blocks. The existing 31 Bury Street does exactly that.

30. The only existing tall building within the Conservation Area, One Creechurch Place, is included because of its historic association with the site of the Great Synagogue, although the building itself does not contribute positively to the character and appearance of the area. The Planning Officer's report does refer to the 2017 consent (which has been granted a Certificate of Lawful Development) to redevelop 24 Bevis Marks with a 19 storey office building, but it should be noted that this is immediately next to the much taller 70 St Mary Axe, and so immediately in its shadow. The proposed tower at 31 Bury Street has a very different context, next to Holland House, Cunard House and the warehouses in Creechurch lane.

31. The designation report notes that Bury Street forms an obvious division between the more historic granular scale to the east and the much larger and more modern scale of the City Cluster. There is no case whatsoever for allowing a tall building on the north side of Bury Street. The height scale and mass of the proposed tower will overwhelm the Conservation Area, from almost every possible direction. Views 46 and 58 of the applicant's HTVIA illustrates the impact that will be had on Creechurch Lane, Mitre Street, Heneage Lane, Bevis Marks and Bury Street. While it might be argued that some individual views cause less than substantial harm in their own right, the continuum of views down so many streets from within and into the Conservation Area from outside will result in a cumulative impact that causes **substantial harm** to the character and appearance of the Conservation Area. Indeed, were the proposed development to be allowed it would render the designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise. As a precedent it would potentially undermine the ability to preserve and enhance any of the City's conservation areas, and indeed have implications nationwide.

Bevis Marks Synagogue

32. By reason of its height and proximity the proposed tower will overwhelm the Synagogue. The visual and psychological impact on the courtyard would be catastrophic, equally severe as the previously refused scheme. The serious incursion into the open sky views will fundamentally undermine the intrinsic secluded and dignified quality of the space. The loss of light to the interior of the Synagogue is also a major concern. The

impact on the Synagogue and its courtyard will be both tangible and intangible, as explained in the assessment of significance in paragraphs 15 and 16 above.
33. The applicant's HTVIA includes Views 45A and 45B, deemed by the applicant to be of 'medium' sensitivity, and where the impact is described as 'moderate and beneficial'. Such an analysis demonstrates a complete lack of understanding by the applicant of the significance of the Synagogue and its courtyard.
34. The setting of the east elevation of the Synagogue fronting Heneage Lane will also be harmed, being totally dominated by the new tower, although no view is provided of this in the applicant's HTVIA.
35. Overall, the proposals cause **substantial harm** to the significance of the Synagogue and its setting.
36. The harm caused will also do much to spoil Bevis Marks as a potential visitor attraction which in turn will harm the City Corporation's ambitions to increase tourism.

St Katharine Cree

37. No verified view has been provided by the applicant from the south side of Leadenhall Street looking northwards down Creechurch Lane. (View 46 in the HTVIA does not cover this). This important view is flanked on the right by the charming tower of the church, seen against clear sky, and on the left by Cunard House, with the view terminated by the existing 31 Bury Street. The massive height of the proposed tower will radically alter this view and cause a **moderately high** degree of **less than substantial harm** to the setting of St Katharine Cree.
38. It is unclear whether the proposed tower will also impinge into the existing secluded space of the churchyard to the rear of Mitre Street and Creechurch Lane which is surrounded at present by low buildings. No verified view has been provided from the southern side of the churchyard.

St Botolph's

39. Although some of the HTVIA views presented by the applicant show that the tower and spire of St Botolph's Church is already impacted by the 19 storey mass of One Creechurch Place, it is considered that the much greater height and prominence of the proposal, almost immediately behind, will further erode the landmark qualities of St Botolph's. View 38 has been taken from a position where the new tower will arguably be covered by other proposed tall buildings behind. No view has been provided further west along Aldgate which would show that the proposed tower at 31 Bury Street will rise significantly above One Creechurch Place and challenge the landmark quality of St Botolph's. It will cause a **moderate** degree of **less than substantial harm** to the setting of

this Grade I building and will diminish the skyline presence identified in the Protected View SPD.

Holland House

40. The proposal involves radical alterations to the fabric, plan form and integrity of Holland House. The demolition of most of the east elevation, the insertion of a large new staircase, the capping off and enclosure of the internal lightwell and the opening up of its floor plans to link continuously with the new building at 31 Bury Street and the rebuilt Renown House will greatly change and reduce the individual identity of Holland House. The proposals effectively subsume Holland House into one huge floorplate building running across the entire application site. These appear to be major and irreversible changes.

41. The four-storey roof extension is out of proportion with the original five storey building, appearing top heavy. This is clearly apparent in Views 42, 43 and 60 of the applicant's HTVIA.

42. The setting of Holland House is massively affected by the proposed tower. Despite the vertical format of Views 43 and 60 they do not manage to include the full height of the tower. While One Creechurch Place is visible in the existing View 60, the impact of the proposal, immediately adjacent to Holland House, will be far greater.

43. The immediate setting of the south elevation of Holland House will also be severely harmed by the scale and proximity of the new tower at 31 Bury Street. This is shown in the illustrative CGIs Figures 6.6, 6.8 and 6.10 of the applicant's HTVIA Volume 2. The height and scale of the undercroft is completely out of proportion to Holland House, and the existing forecourt between 31 Bury Street and Holland House is substantially reduced in width. View 58 shows how the existing Bury House is sympathetic in scale to Holland House, whereas in the proposal it will appear visually crushed by the overwhelming scale of its neighbours.

44. Overall, the proposals cause **high** degree of **less than substantial harm** to the significance of this designated heritage asset.

Aldgate School

45. The comparatively modest height (19 storeys) of One Creechurch Place is already visible as a backdrop to views of the school from Aldgate, and has a negative impact. View 41 of the HTVIA, looking down Mitre Street, shows how much taller the new tower will be, having an additional negative impact, by increasing the undesirable sense of enclosure and overlooking. It will cause a **minor** degree of **less than substantial harm** to its setting.

2-16 Creechurch Lane

46. The existing massing of 31 Bury Street, occupying the corner with Creechurch Lane, provides a sympathetic scale and context to the five storey scale of 2-16 Creechurch Lane. The setting of these fine warehouse buildings will be adversely affected by the proposed tower which will become an overpowering presence in the street. It will cause a **moderately high** degree of **less than substantial harm** to the setting of these listed buildings.

Tower of London

47. It is acknowledged that Historic England is the heritage body best equipped to comment on the impact of the proposals on the Tower of London World Heritage Site. Several views provided in the applicant's HTVIA clearly show that the proposal will be a serious incursion into the backdrop which will cause harm to the setting of the Tower of London.

48. The applicant's justification that the new tall building will be part of the northern 'foothills' of the City Tower Cluster seems a tenuous and unconvincing argument. Far from softening the existing edge provided by curved form of 30 St Mary Axe (the'Gherkin') the new tower at 31 Bury Street as seen in View 9 makes a very undesirable intrusion into LVMF 10.1A, reducing the prominence of the south-west turret of the White Tower. Views 25, 26, 27, 28 and 30 show how the existing curved edge of 30 St Mary Axe will be negated and exceeded by the new tower, appearing as a taller outlier to the cluster.

49. The HTVIA also provides views from within the precincts of the Tower. View 23, from the Inner Ward, shows how the proposed tower will intrude into the existing clear sky above the east end of the Royal Chapel. View 24 shows the tower rising above 2 Tower Green. View 49 demonstrates that the proposed tower will fill the existing clear gap between the town houses and the tower of the Royal Chapel, a view of 'high sensitivity'. View 51 shows incursion into the existing clear sky above the Watergate.

50. The applicant's assertion that the proposed tower would signify a new 'edge' to the City Tower Cluster is highly contentious; indeed, the opposite is likely. If approved it would likely set a precedent for allowing further towers in the Conservation Area, including for example 33 Creechurch Lane.

Port of London Authority Building 10 Trinity Square

51. Views 28 and 50 of the HTVIA show how the new tower will impinge on the skyline presence of the landmark tower of the PLA Building. It will cause a **moderately high** degree of **less than substantial harm** to this aspect of its heritage significance.

38 St Mary Axe

52. View 55 of the HTVIA shows that the existing clear sky view above the listed 38 St Mary Axe will be infringed by the proposed tower. No other proposed or approved tall buildings are visible in this view from Clerks Place. Owing to the narrow nature of St Mary Axe this is the only long view of the frontage. The proposal will cause a **moderately low** degree of **less than substantial harm** to the setting of this designated heritage asset.

Lloyd's Avenue Conservation Area

53. The Lloyd's Avenue Conservation Area Character Summary and Management Strategy SPD, adopted in January 2012, identifies various views within the Conservation Area which are important to its character and appearance and its heritage significance : "The double curve of Lloyd's Avenue creates a series of subtly different views north along Lloyd's Avenue, with each building viewed obliquely and collectively in groups. At the top of the street, Furness House, 105-106 Fenchurch Street, has a dominant presence and terminates the view with its imposing central pedimented bay being gradually revealed upon approach".

54. Views 40 and 52 in the applicant's HTVIA show that the proposed tower at 31 Bury Street will form a very prominent backdrop to the existing continuum of views. It will appear as an intrusive and alien element in a remarkably unified existing townscape and will cause a **moderate** degree of **less than substantial harm** to the setting of the Lloyd's Avenue Conservation Area.

Renown House 33-34 Bury Street

55. The proposal involves the retention of only the two stone street facades of Renown House. The existing mansard roof, dormer windows, prominent chimney stack and the complete interior of the building are to be demolished. The proposed additional vertical floor harms the architectural proportions and balance of the original design and appears crudely detailed. The ungainly proportions of the proposal are apparent in View 59 of the HTVIA, seen from Cunard Place. The additional mansard and dormers are also poorly detailed, unsympathetic to the Edwardian character of the building. New floor levels are inserted to line through with the rest of the development and will result in bulkheads crossing the existing window openings, as shown in Figures 6.3, 6.5. 6.11 and 6.12 of the HTVIA.

56. The setting of Renown House will also be overwhelmed by the roof extensions to Holland House and the height of the tower. This harmful impact is illustrated in Figure 6.1 and Views 42 and 60 of the applicant's HTVIA, and although they do no show the full height of the tower. Views 42 and 59 show how the existing chimney stack and pots of Renown House are currently seen against the sky, something that is completely lost in the

proposal. The scheme will cause a **high** degree of **less than substantial harm** to this non-designated heritage asset.

Rabbi's House and Vestry, 2 and 4 Heneage Lane

57. The massive scale of the proposed tower at the southern end of Heneage Lane will dominate the townscape of Heneage Lane whose existing modest scale is an inherent part of its charm. The proposal will result in a **moderately high** degree of **less than substantial harm** to these non-designated heritage assets which front onto Heneage Lane either side of the east end of the Synagogue.

Cree House, 18-20 Creechurch Lane; Fibi House, 22-24 Creechurch Lane; Sugar Bakers' Court; 12-14 and 27-31 Mitre Street

58. This important group of late 19th century warehouses sits directly opposite and very close to the existing 31 Bury Street which at present is a consistent scale with its neighbours. While View 41 of the HTVIA is taken from Leadenhall Street, no closer view down Mitre Street has been provided which would show how the existing 31 Bury Street is an entirely appropriate scale relating to the Mitre Street warehouses. The massive height and scale of the proposed tower and its base will dominate and overpower the existing townscape and will result in a **moderately high** degree of **less than substantial harm** to the setting of these non-designated heritage assets.

COMPLIANCE WITH POLICY

59. It is considered that there is clear conflict with the statutory duties to protect the significance of listed buildings and to preserve and enhance the character and appearance of the Creechurch Conservation Area.
60. The proposal breaches Policy D9 of the London Plan which require the protection of heritage assets
61. The proposal conflicts with Local Plan policies to conserve and enhance the City's conservation areas. The proposal conflicts with Local Plan Policy CS14 (2) which states that tall buildings are not appropriate within conservation areas. While the draft City Plan 2040 proposes to change that policy it can be given very little weight at this stage.
62. The proposal conflicts with Local Plan Policy CS13 (2) to protect City landmarks and skyline features.
63. The proposals conflict with policies that seek to protect the setting of the Tower of London World Heritage Site.

ASSESSMENT OF HERITAGE BENEFITS PROPOSED BY THE APPLICANT

64. The applicant suggest that a number of public benefits will be provided by the development including some that are claimed to be heritage benefits. These are addressed and evaluated below.

65. Repairs and renovations are proposed to internal and external features of Holland House. This should all be regarded as routine repair and upgrading which any responsible owner of a listed building would automatically undertake. The assertion in Paragraph 2.32 of the applicant's Planning Statement that repairs to the faience tiles of Holland House can only be viably funded and delivered through the wider redevelopment of the site seems fanciful and hard to prove. The £ 4 million cost estimated by the applicant for faience repairs, window upgrades and renovation of internal spaces must be tiny fraction of the budget for the extensive works and extensions to Holland House, let along to the scheme as a whole.

66. The applicant claims to be reinstating the southern arm of the original historic Heneage Lane. The proposed ground floor plan shows that the new retail arcade running beneath the new tower does not in fact line up with Heneage Lane, but dog-legs to the east and is at a different angle. The original medieval Heneage Lane ran dead straight from Bevis Marks to Bury Street. No clear view through from the north end of Heneage Lane would be provided by the proposal. Furthermore, the applicant states that it will be gated and closed at night.

67. Similarly, the proposed reinstatement of James Court is both historically inaccurate and misleading. The reality of the proposal is a two-storey undercroft or arcade below the tower, separated from the street by the supporting structure of the tower. It is likely to a singularly unattractive place for the general public. It significantly reduces the size of the existing open courtyard between the existing 31 Bury Street and Holland House, which more accurately sits on the original site of James Court. The bombastic architectural treatment of the new building greatly changes the existing pedestrian townscape of narrow streets and pavements that characterise the area. The height and proportion of this undercroft and its columns is completely out of scale with Holland House. There are no heritage benefits provided here, only harm existing heritage assets.

68. Proposed works to the public highway are outside the ownership of the applicant and are the remit of the City Corporation. Demolition and construction work is likely to severely damage the existing pavements and carriageways, and the developer would normally be expected to pay for their reinstatement to the City's required standards without this being considered a public benefit.

69. The applicant claims that the design of the new tower will be of exceptional quality which will enhance the setting of Holland House, but there is little in the submitted

drawings to support this. No amount of modelling or material finishes can overcome the entirely inappropriate scale and massing of the proposed new building. In any event good design in a fundamental requirement of all development and is not in itself a public benefit.

BALANCING HARM AGAINST PUBLIC BENEFIT

70. Paragraph 205 of NPPF states that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance". Many of the heritage assets affected by the proposals are of the highest possible heritage significance and their conservation must therefore be accorded very great weight. Although the applicant repeated states that great weight should be given to the postulated public benefits, there is nothing in NPPF to support that.

71. Paragraph 206 states that any harm to the significance of a designated heritage asset, including development within its setting, should require clear and convincing justification. Substantial harm to grade II buildings should be exceptional; substantial harm to Grade I buildings should be wholly exceptional.

72. Paragraph 207 states that where development will lead to substantial harm to a designated heritage asset, consent should be refused unless it can be demonstrated that the substantial harm is necessary to achieve the substantial public benefits that outweigh that harm.

73. Paragraph 208 states that where development will lead to less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of that proposal.

74. It is considered that the cumulative and high degree of harm to a such a large and widespread number of designated heritage assets far outweighs the alleged public benefits that the applicant claims will arise from the proposed development.

CONCLUSION

75. Paragraph 203 of NPPF requires Local Planning Authorities when determining applications to take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation: b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality: and c) the desirability of new development making a positive contribution to local character and distinctiveness.

76. The proposed development fails to meet any of these criteria. As concluded above, the scheme is considered to cause substantial harm to the Creechurch Lane Conservation Area and to the Bevis Marks Synagogue. In addition there are multiple cases of less than substantial harm to a wide range of designated and undesignated heritage assets, some of the very highest significance including the Tower of London World Heritage Site. Cumulatively the degree of harm is serious, and must be given very great weight. The public benefits claimed by the applicant, including alleged heritage benefits, go nowhere near to outweighing the harm.

77. There were very good reasons for refusing the previous proposals for 31 Bury Street, namely the adverse impact on Bevis Marks Synagogue and the protected views of the Tower of London. These reasons continue to apply to the current scheme, augmented by the additional harm now caused to the new Creechurch Conservation Area, Holland House and Renown House. It is strongly recommended that the planning and listed building consent applications be refused.

22nd April 2024

Alec Forshaw, together with Esther Robinson, was the author of the Option Three proposal for the designation of Creechurch Conservation Area, the option that was eventually approved by the City Corporation. He was Principal Conservation and Design Officer for the London Borough of Islington, where he worked from 1975 – 2007. He has written widely on historical and architectural matters, including *New City, Contemporary Architecture in the City of London* (2013), *The Barbican, Architecture and Light* (2015), and *Smithfield, Past, Present and Future* (2015). He gave evidence on behalf of SAVE Britain's Heritage in support of the City of London's refusal of planning and listed building consent at the Custom House Public Inquiry in February 2022.

Appendix 2: Letter from Rabbi Joseph Dweck

the S&PHARDI community ק"ק שער השמים
Rabbi Joseph Dweck | Senior Rabbi
הרב יוסף דוויך | רב הראשי

בס"ד

Centrality of Sky View at Bevis Marks to Religious Services and Heritage

Given the concerning plight under which Bevis Marks Synagogue, the oldest continuously used synagogue in the world finds itself, I offer here some core points based in millennia-old Jewish law that is central to the synagogue's function and vitality.

1. The spiritual significance of the sky view at Bevis Marks has been inscribed into the material fabric of the building. In Hebrew, the synagogue is known as Sha'ar Hashamayim (Gate of Heaven). These words – Sha'ar Hashamayim - are carved in stone above the entrance gate, and painted above the synagogue's doors. They originate in the Biblical episode of Jacob's dream of a ladder with angles ascending and descending. Upon waking Jacob exclaimed: 'How awesome is this place, it is none other than the House of G-d and the Gate of Heaven'.[1] For this reason 'Gate of Heaven' is considered a euphemism for a 'House of G-d': Adjacent Aldgate and Bishopgate may have been the gates into the City of London, but the synagogue was the 'Gate of Heaven' for the City's Jews. The experience of 'heaven' is currently felt upon entering the quiet courtyard of Bevis Marks Synagogue, and seeing the sky around it, particularly as it frames the synagogue itself to its immediate south.
2. The sky view in the courtyard at Bevis Marks serves important ritual purpose as the sky view is central to Jewish practice. Jews are always looking up in a sense, to judge their religious timings and rhythms. One which occurs weekly is the Sabbath. The Sabbath does not officially end at any specific time on the clock per se (it was kept for generations before the invention of any clock). Rather, it is determined ended when the average person can see three medium sized stars in the sky[2]. While we do tend to rely on the clock when it is cloudy out, it is still very much part of our conscious inspection regarding the sabbath times. This timing is central for many other aspects of ritual and worship. For example, reciting the *Shema Yisrael* which is an obligation every evening must be done only after 3 medium sized stars are seen in the sky[3].
3. Similarly, the beginning of each new Jewish (lunar) month is marked by the appearance of the new moon. Each month, about a week after seeing the new moon, we then say a

[1] Genesis 28:16-17

[2] BT, Shabbat, 35b; Maimonides, MT, Shabbat, 5:4; Shulhan Arukkh, Orah Haim, 235:1.

[3] MT, Keriat Shema, 1:9; Shulhan Arukh 235:1.

4. special blessing over the new moon[4]. This is done by going outside and finding the moon in the sky in order to say the prayers. If there is considerable obstruction it renders it impossible to perform this monthly ritual. We pray that as the moon steadily grows more and more full, so should the Jewish people, and so too we should be renewed just as the moon is constantly renewed. If there is constant physical obstruction to the sight of the moon from the synagogue grounds it would severely affect this monthly ritual and cause a great lack in the normal and usual synagogue services. Should buildings block out views of the eastern and southern sky, this ritual would be lost to the synagogue community.
5. Importantly, the sky view is critical to ensuring that enough daylight reaches the interior of the synagogue to enable the community to pray there even on dark winter days, and to retain the existing spiritual qualities of the building. The reading of a large quantity of printed texts by all present is intrinsic to Jewish worship and light levels must be maintained to enable this critical ability.
6. Finally, in general windows with their sky views are essential to a synagogue. This is expressed primarily in the Babylonian Talmud (Berakhot, 31a) in its referencing of verse 6:11 from the book of Daniel. The Talmud states: 'Rabbi Ḥiyya bar Abba said: One should always pray in a house with windows, as it is stated regarding Daniel: "And when Daniel knew that the writing was signed, he went to his house. In his attic there were open windows facing Jerusalem, and three times a day he knelt upon his knees and prayed and gave thanks before his God, just as he had done before." Likewise, the pre-eminent Jewish legal authority Rabbi Yosef Karo (Bet Yosef, OH:90) asserted that windows enable one to see the sky, look heavenward during prayer, and experience humility. If the windows are all obstructed it shuts the synagogue away from the outside world and considerably damages the entire environment and ambience that is meant for a synagogue.
7. This requirement to pray in a house with windows further reflects the fact that the observance of Jewish rituals is shaped by the positions of the sun and moon in the sky across the day, month and year. For example, Jewish prayer times are determined by the daily course of the sun: its journey from east to west over the southern horizon determines the times of our prayers, and is the inspiration for much of our liturgy. For this reason, the morning service (Shahrit) begins with the blessing, 'Blessed are you G-d who is sovereign over the universe, who fashions light and creates darkness…who brings light over all of the land and refreshes creation each day…Blessed are you G-d who creates the luminaries.' Later in the morning, when light currently shines into our

[4] BT, Sanhedrin, 42a; MT, Berakhot, 10:16; SA, Orah Haim, 426

8. courtyard and penetrates into the synagogue, it casts its glow across the pews, creating warmth on the faces of congregants, and lifting their thoughts skyward. On Yom Kippur, the darkening light and the glow of candles in the evening is a sign that the Gates of Mercy are about to close. In this way, the changing presence of light in the synagogue is intimately connected to the spiritual experience of worshippers. Any change to the current sky view would have profound implications for the religious value of the synagogue as a spiritual space and house of Jewish prayer.
9. Originally, the courtyard on three sides ensured that the synagogue windows were completely unobstructed, maximising the daylight admitted. Since then, the construction of higher buildings in the surrounding area which encroach upon the synagogue's sky view has reduced the amount of direct sunlight and reflected light entering the synagogue through these windows, significantly darkening the interior. Nevertheless, when looking out from the synagogue gallery windows one can still see the sky on both sides. Any further encroachment on the synagogue sky view is likely to make that impossible, blocking direct light and reducing the amount of reflected light that reaches the interior to a dangerously low level that threatens the synagogue's ability to function.
10. Finally, Circumcision is a foundational ritual in Judaism since only after he is circumcised is a Jewish boy considered to have joined the Jewish community: it is a medical procedure carried out on a baby's eighth day by a trained professional called a mohel. Ample light is essential to perform this ritual safely, but recent testimony from mohels who have conducted circumcisions in Bevis Marks confirms that any further reduction to light levels would render this impossible. Bevis Marks Synagogue contains two historic circumcision chairs from the seventeenth and eighteenth centuries, testifying to the long history of circumcision here. Ending the practice of circumcision at Bevis Marks would mark a significant rupture in three hundred years of tradition, harming the synagogue's significance as a place of worship and communal life.

As it is clearly evident, the above is just a selection of a vast legal system that is dependent on a profound connection with the observation of the celestial bodies and the movement of the earth in space and around the sun. For this to be cut off or obstructed, terribly damages and severely inhibits the *élan vital* of the community.

Joseph Dweck

15 May 2024

Ref: 24/00021/FULEIA

Dear Ms Tastsoglou,

I'm writing to object in the strongest terms to the proposed redevelopment at 31 Bury St. I write as a private resident in the City of London and as the rabbi of the Bevis Marks Synagogue.

I object due to the **substantial harm** the proposed tower would have on the functioning and viability of the synagogue, its Heritage Centre, its enormous heritage value, and on me as a local resident. The developers treat the synagogue as a heritage asset but fail to address the harm their proposal would cause to the synagogue's primary function as a house of worship and community space. The harm caused by this proposed development, both in its own account and due to the cumulative effect of previously built and consented tall buildings around the synagogue, puts at risk the core purpose of the Bevis Marks Synagogue as a fully functioning place of Jewish worship. Thus, the harm that puts this at risk must be classified as **substantial harm**, or even **total loss of significance**.

Before delineating my concerns, it is necessary to state that this process has caused significant distress within the Jewish community. Any consultation would be challenging, but to have to repeat this process for an application which is clearly inappropriate and has already been rejected is oppressive in nature. In fact, this is now the fifth consultation that our community has needed to engage in over these matters over the past two years. Each consultation further drains our resources and places an immense burden on our community. We are disappointed that repeated efforts to work collaboratively with the Corporation have failed to result in policies that prevent this kind of harmful application from coming forward, something which we earnestly hope can still be rectified.

For clarity, each time we seem to have achieved a desired result, the Corporation has pulled back.

1. When proposing a Conservation Area, there was an inexplicable attempt by the Corporation to exclude 31 Bury St from this area.
2. Only weeks after adopting the CA with 31 Bury St included, the Corporation published its draft local plan which proposes to remove a previous restriction on tall buildings in Conservation Areas.

3. In putting forward an ‘immediate setting’ protection scheme for the synagogue in the draft local plan (a concept invented by the City, which has no legal status), the City has attempted to deny the impact of a tower at 31 Bury St on the synagogue, despite robust professional representations made by scholars to explain the harm that a tall building at that site would cause. While the policy gives the impression of protecting the synagogue, in effect it justifies substantial harm to it.

In total, these moves may be construed by some to be in support the applicant, despite the harm their proposal would cause to the synagogue. I hope this has not been wilful, but it does reflect a general ignorance for Judaism and Jewish culture, a serious inadequacy for the City which I hope this consultation will help with addressing.

I now attempt to explain my views in an organised manner.

1. It is difficult to overestimate the significance of Bevis Marks Synagogue as the first purpose-built Jewish house of worship in England following the 1656 resettlement. It is also the only non-Christian house of worship in the City of London. Finally, and perhaps more importantly, due to the Holocaust and other Jewish expulsions in other places around the world, it is the only surviving synagogue in the world to have maintained regular worship dating back to 1701. It is therefore of the highest significance locally, nationally and internationally.
2. Furthermore, the synagogue maintains a unique form of Jewish worship, that of the Spanish & Portuguese Jews. Many of its melodies, traditions and rituals are preserved only within this congregation, making its maintenance of great importance to the preservation of its unique intangible heritage which would otherwise be lost.
3. The synagogue receives low levels of light, but just enough to maintain Jewish worship which requires sufficient light for young and old alike to be able to read hundreds of pages of prayers. However, it cannot absorb further reductions before the maintenance of this worship becomes untenable. The noticeable impact on light reduction from 1 Creechurch makes clear that this impact is real. The developer’s admittance of reduction in our light levels affirms this reality. However, its dismissal of these reductions as minor or negligible is detached from the reality we face where further reductions are unacceptable as the cumulative impact of yet another reduction cannot be further tolerated. When light levels are poor, each further reduction, even amounts that in other contexts would be considered minor, in this context will be perceptible and several damaging. Without doubt then, with respect to internal light levels, the proposed tower would cause **substantial harm**, by risking the viability of use of Bevis Marks Synagogue for its original purpose, as a place of Jewish worship.
4. As reported during the last application by Dr Joseph Spitzer, president of the Initiation Society which oversees Jewish ritual circumcision in the UK, any further reduction in light levels will make it impossible to continue to safely carry out ritual circumcision, a

core marker of Jewish identity. The existence of multiple historic circumcision chairs in the collection of Bevis Marks Synagogue testifies to the long history of this ritual being performed at Bevis Marks Synagogue, as it continues to be maintained at the synagogue even until today. Rendering the performance of this important Jewish marker impossible at Bevis Marks Synagogue would surely be a **substantial harm**.

5. The location of the proposed tower along the southern horizon, adds to the **substantial harm** it would cause to the use of Bevis Marks Synagogue as a synagogue and to our worshipping community. Each month, Jews gather outside after dark to recite *kiddush levana*, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer. This is a direct obstruction to our freedom of worship as we have enjoyed it in this place since 1701.

6. The courtyard is also an important part of the community space, as a location where we celebrate festivals (such as Succot), hold receptions (for weddings and after services) and conduct events (such as BBQs and socials for City workers). The overshadowing of this space would significantly harm the amenity use of this space, particularly during the Spring/Summer months when it is more often utilised.

7. The courtyard is also an essential part of the visitor experience of our new visitor centre. It is where visitors will first enter, purchase admission, begin their audio guide, study a bronze map of the site and surrounding area, and study the exterior of the synagogue. The courtyard is a destination in its own right, not just a passage to the synagogue. The courtyard will also be used as part of our cafe. A decrease in amenity of this space risks the viability of our new venture, which in turn places the future viability of the synagogue at risk. It is a shared human experience that people don't tend to enjoy spaces that are in the shadows. As such the proposed tower would make the space unwelcoming and unappealing to visitors and community members alike, removing its significance. This impact must be considered **significant harm**.

8. Developers have admitted that the proposed tower would reduce light levels in the Beadle's House, but have discounted these harms due to their identification of the upper floors as bedrooms. However, on account of the bright light in these upper floors, they are utilised throughout the day as rooms for reading (with reading chairs), a key need for a rabbi as study is a religious requirement, and as a playroom for the rabbi's family. The Beadle's house is therefore used throughout the day and reductions in its remaining best light must be considered a **significant harm** to both a **resident** and to the **heritage** of this historic property.

9. A near identical tower proposal for this site was rejected in 2021. The reason cited on that occasion was the harm it would cause to the synagogue's setting. This new submission is little changed in any way that reduces the harm it would cause to the above as it would continue to dominate and overshadow the synagogue site, detracting from the significance of the synagogue and its courtyard.

10. Indeed, since then, the City of London established the Creechurch Conservation Area, further increasing the threshold for allowing harm to sites within the CA, most notably the Grade-1 listed Bevis Marks Synagogue.

11. Beyond this, the Conservation Area report identified as significant the townscapes down Heneage Lane and down Mitre St, both of which culminate in Bury House. The report noted the sense of coherence of these streets due to the similar scale of the buildings along them. A tower at 31 Bury St would destroy this historic character and is therefore completely out of step with the new Conservation Area. As such, it would cause **significant harm** to the Conservation Area as a whole.

12. Most clearly, there is a provision in the current local plan that bars tall buildings in Conservation Areas, making it difficult to understand how this application moved beyond the pre-app stage of planning. Regardless, for this reason alone it should be refused out of hand. Furthermore, the possibility that this policy may be removed from the Local Plan 2040 has no bearing at this point, especially when considering that it is not without considerable controversy, which according the planning guidelines means it cannot be relied upon at this stage in the local plan process before adoption.

13. Furthermore, that Local Plan states that while the eastern cluster is designated for tall buildings, not every site within it will be appropriate for tall buildings. If this isn't the case example for that I can't understand where it wouldn't be acceptable.

14. For the purpose of clarity, I wish to confirm the near-constant anticipated use of the synagogue site for religious, communal and tourist purposes. Some of this may not be self-evident due to the impact of covid and the launch of our NLHF supported redevelopment project which began in 2020 and continues. As a result, we've had to step back from much of our usual activity, in anticipation of a large increase in activity from pre-2020 numbers. This will include daily worship, both in the morning and midday, and on the Sabbath and Jewish festivals. Furthermore, we will regularly conduct evening events, and weekend weddings. Finally, our visitor centre will be opened Sunday-Friday, welcoming at least 25,000 visitors a year including thousands of local school-children. All of these activities will be harmed in different ways by the proposed tower.

15. It is unconscionable that at a moment when Bevis Marks Synagogue is about to embark on a new chapter of vitality in its storied history, that the City of London would approve a development that puts its very future at risk, and certainly places it in a more challenging situation. This would be far from celebrating the synagogue's heritage and ongoing contribution to the City of London.

16. The synagogue as a whole should be seen as one of the best expressions of the 'Destination City' vision, and harm to it must be avoided.

17. The generic public benefits offered by the developers do not in any way counteract the **substantial and enduring harm** their proposed tower would cause to the

synagogue and its functioning as a living place of Judaism, one of the most unique synagogues in the world. Permission would further chip away at the ability of Bevis Marks Synagogue to function as a synagogue, placing it at existential risk of becoming yet another 'heritage asset'. Once the unbroken chain of worship is broken, it can never be repaired, and all that Bevis Marks Synagogue is and represents will be lost to history.

18. With further regard to the proposed benefits made by the applicant, making use of lower floors for charities does not justify the construction of a tower. These benefits could equally be offered even with a shorter building, just as they are currently being offered to charities with the current Holland House building. Furthermore, the charity space is in Holland House, which is adjacent to Bury House. Just because the developers own both properties, the use of Holland House does not constitute a public benefit to the Bury St application that should justify the **substantial harm** that Bury House would cause to the Bevis Marks Synagogue. In addition, the use of this space by non-local charities does not justify harm to a local community (Bevis Marks) who should be the primary concern of neighbouring developers, not sidestepped as this proposal tries to do. Finally, these benefits are not unique, and could equally be offered in any other scheme. Therefore they are not a justification to cause harm to the functioning and setting of the synagogue, a site that irreplaceable and altogether unique, and is of the highest level of significance.

In sum, this scheme is so ludicrously inappropriate that I can't believe developers have not withdrawn their application. If we were in a court, I'd ask the City to throw out the application as frivolous. Save that, I implore the Corporation to refuse this application and once and for all protect the integrity and future of Bevis Marks Synagogue

In sincerity and friendship,

Rabbi Shalom Morris

Bevis Marks Synagogue

EC3A 7LH

From: [redacted]
To: lpaburystreet
Subject: Application Ref: 24/00011/LBC and 24/00021/FULEIA
Date: 11 June 2024 10:54:26

You don't often get email from ross.anthony@hbap.org.uk. Learn why this is important

THIS IS AN EXTERNAL EMAIL

FAO: Anna Tastsoglou

Address: Holland House 1 - 4, 32 Bury Street London EC3A 5AW
Application Ref: 24/00011/LBC and 24/00021/FULEIA

Proposal: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Statutory Remit: Historic Buildings & Places (formerly the Ancient Monuments Society) is a consultee for Listed Building Consent applications, as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for notifying HB&P about the above applications. I apologise for the delay in responding. HB&P have reviewed the documentation available online and provide the following objection to the proposal.

Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage for a shipping company. Berlage was a major architect in the Netherlands and Holland House was a rare commission in England. Berlage took inspiration from the works of pioneering American architect Louis Sullivan. It is noted for its pronounced vertical ribs, faience cladding and its elaborately tiled entrance lobby, and is one of the first steel framed structures within the City. Holland House is also a key contributory building within the newly established Creechurch Conservation Area.

The adjacent Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building contributes to the setting of Holland House and character of the Creechurch Conservation Area.

HB&P objects to the proposed four-storey extension to both Holland House and Renown House. It is an intrusive, bulky, and top-heavy addition to both buildings that fails to respect their proportions and scale. The extension would result in the loss of historic fabric, particularly within Holland House at roof level and the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest.

The construction of the 43-storey tower at 31 Bury Street would have a significant impact on the appearance and special architectural and historic character of the Creechurch Conservation Area. The concept of a tower with a conservation area predominantly characterised by low and medium height buildings would compromise this character and cause irreparable harm to the setting of several key listed buildings, including Holland House and the Bevis Marks Synagogue

Policy: The total inappropriateness of a tower within a conservation area is clearly stated in the City of London's Adopted Local Plan (2015), notably Core Strategic Policy CS10: Design, which requires "that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces". Policy CS14: Tall buildings states "Refusing planning permission for tall buildings within inappropriate areas, comprising of conservation areas".

Chapter 16 of the NPPF (2023) manages change within the historic environment. Paragraph 205 states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation". And at Para 206: "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."

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Recommendation: The proposal is clearly contrary to the local plan and to national planning policy by virtue of the tower's scale and height, and by the extent and bulk of the alterations and additions proposed to the grade II* Holland House. It should therefore be refused.

Regards

Ross Anthony

Case Work

HISTORIC BUILDINGS & PLACES

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Historic Buildings & Places is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and a consultee on Listed Building Consent applications as per the ***Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021***. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.

22 May 2024

Anna Tastoglou
City of London Corporation
Department of Planning and Transportation
PO Box 270
Guildhall
London
EC2P EJ

Dear Ms Tastoglou,

I am writing on behalf of ClusterFlux Theatre Company to express our strong support for the planning application being proposed by WELPUT for the redevelopment of Bury House, Holland House, and Renown House.

ClusterFlux is dedicated to creating innovative multimedia theatre that resonates with contemporary audiences through a blend of live sound production, physical choreographies, song, and original text. Our development to date has been supported by New Diorama Theatre, CPT and Theatre Deli. We have been awarded Curious Directives inaugural Hypothesis Grant, LPS' Seeding Space, and an Arts Depot Residency. Our critically acclaimed show PLEASE LEAVE (a message) was shortlisted for the Untapped Award.

Since the beginning of the year, we have been utilising the spaces within Holland House every Monday evening to develop new works and rehearse for our upcoming international debut at the Amsterdam Fringe in September. During this time, we have achieved significant milestones, including writing an animation short, adapting our debut show for students who subsequently performed it at the Massachusetts Drama Festival, and initiating the development of a new show.

The availability of this space has been invaluable to our creative process and to the growth of our company. In a sector where free and regular rehearsal space is a rarity, the opportunity to work at Holland House has been crucial, not only for us but for other emerging theatre companies like Junk Theatre. The theatre industry is currently facing significant challenges, and spaces like these are essential for nurturing new talent and ensuring the continued vibrancy of the sector.

The redevelopment of Holland House offers a unique opportunity to support the unmet demand for affordable creative workspaces in the City. This initiative would not only benefit local artists and companies like ours but also contribute to the cultural landscape and attractiveness of the area.

We wholeheartedly support the application in principle and urge the City to approve these proposals. We believe that this redevelopment will make a lasting and positive impact on the cultural fabric of our community.

Kind Regards,

Christopher Whyte
Co-Director
ClusterFlux Theatre Company



THE HONOURABLE COMPANY OF MASTER MARINERS

Representation on Applications 24/00021/FULEIA and 24/00011/LBC

Bury House 1 - 4, 31 - 34 Bury Street, London EC3A 5AR

14th May 2024; revised 12th June 2024

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THE HONOURABLE COMPANY OF MASTER MARINERS

The Honourable Company of Master Mariners is a City of London livery company, its membership primarily comprising senior Merchant Navy and Royal Navy officers but drawn also from the wider maritime sector. The Company (https://hcmm.org.uk) sets and maintains professional standards through the Chartered Master Mariner and Mentoring Schemes while also offering educational opportunities for schools and support through its charitable activities.

Formed in 1926, the Company had the title 'Honourable' conferred upon it by HM King George V in 1928, an accolade previously bestowed on only the Honourable Artillery Company and the Honourable East India Company. In 1932, the Court of Aldermen of the City of London granted the Honourable Company of Master Mariners (HCMM) livery status, the first so recognised for 84 years. Her Majesty The Late Queen, Master of the Merchant Navy and Fishing Fleets for the whole of her reign, was the HCMM's Patron from accession in 1952, while His late Royal Highness The Duke of Edinburgh, Lord High Admiral of the United Kingdom, was also the HCMM's Admiral. Since May 2024, the HCMM's Patron has been His Majesty The King.

1. REPRESENTATION ON APPLICATION REF. NO. 24/00021/FULEIA

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

1.1 Its background and purpose outlined above compel the HCMM to register an objection to this planning application centred on No. 31 Bury Street EC3. In this, it wishes to remind the City of London Corporation that on 7th April 2021, it objected similarly to the original application for this site, 20/00848/FULEIA. The HCMM did so not only in defence of the Bevis Marks Synagogue, the most directly impacted, but also the other heritage assets that would be affected by the development, not least those of Trinity Square and the Tower of London World Heritage Site with which it has particular association. These were also the key reasons given by members of the Corporation's Planning and Transportation Committee in refusing the original application at its meeting on 5th October 2021. Moreover, the HCMM later voted with the majority in delineating the conservation area around the Synagogue that now appears to have been ignored by the Corporation. As a City livery company, the HCMM cannot take lightly the need to respond in this situation.

1.2 'Skyscraper' is a term little recognised now as of maritime origin. In the days of square-rigged ships such as tea clippers racing to be first back in London in the 1850s and 1860s, every breath of wind was sought when becalmed. Extra sails would be added up the masts, the seventh and last being the skyscraper. Irony is thus added in this present context, but the HCMM again cites the City's maritime past and present in support of its objection to this revised application which offers only the most marginal modification.

1.3 In 2022, the Corporation launched Destination City, currently promoted as '*The City is the birthplace of London with a unique and diverse offer. Destination City will celebrate, promote, and support the Square Mile's unrivalled history and heritage'*. In fact, from the sea and Thames came the maritime trade out of which the City and so much more grew. It is hoped that the later pages here, outlining a little of that *'unrivalled history and heritage'',* may illustrate the difficulty of attempting to reconcile the Corporation's apparent valuing of heritage with its contradiction as embodied in this application.

1.4 The estate agents' mantra, it is said, is 'Location, location, location' but the more appropriate term is 'context'. Without expertise in the fields of architecture and construction, the HCMM is content to defer to the conservation bodies and specialists. Instead, it is in particular regard to the wider significance and context of the application that it is opposed by the HCMM.

1.5 London, especially the City, is built on maritime trade with much of Britain's maritime past and present to be seen in EC3 alone. The maritime sector remains a significant business presence in the City while the City's worldwide standing as a banking, finance and insurance centre is in turn rooted in maritime trade. In 1694 with the Royal Navy's financial security the aim since re-equipping was needed yet its capitalisation was beyond the Government, the Bank of England was established. The new bank attracted a loan of £1,200,000 (195,265,744 in 2024) raised by subscription. Links with the sea continue today to be commercially and strategically vital to the UK's economy and defence. Current events in the Red Sea demonstrate the rôle of and the country's reliance upon the Merchant Navy and Royal Navy. The supply chain does not consist of just the internet and motorways, some 95% of UK global trade being by sea.

1.6 The Destination City website lists '*Attractions; Experience; Food & Drink; Galleries; Green Spaces; Museums; Restaurants; Shopping; Stay; Theatres and Wellbeing'* as the areas of interest on offer. Despite the '*unrivalled'* claim cited above, heritage is not mentioned. Further, the term appears only twice in the whole website. This, in referring to the City Visitor Trail which invites such to *'feast on the culture, history and heritage'* while noting *'grand heritage hotels' are* available. History itself fares little better. The '*City of London timeline'* within '*Our Story'* on the website records but one maritime date, publication of the first Lloyd's Register in 1764 and omits the two World Wars but does mention the Bevis Marks Synagogue's opening in 1701.

2. REPRESENTATION ON APPLICATION 24/00011/LBC

HOLLAND HOUSE 1 - 4, 32 BURY STREET LONDON EC3A 5AW

2.1 Similarly, what the application proposes for Holland House suggests indifference to its importance, the HCMM thus being obliged to oppose the application. Wm H Muller & Co, a Dutch shipping company, chose Hendrik Berlage to design its London offices in Bury Street. Known as the 'father of Modern architecture' in The Netherlands, the result is said to have been the first steel-framed building in Europe. Berlage is believed to have taken inspiration from the work of American architect Louis Sullivan on a visit to the USA in 1911. External walls of grey-green terracotta or faience tiles, made in Delft and shipped in company vessels, top a black granite base. A merchant ship sculpted by the Dutch artist Joseph Mendes da Costa appears at the southeastern corner of the Grade II*-listed building. Construction of the office block, begun in 1914 and completed in 1916, was made possible during the First World War only by The Netherlands' neutrality. It is thought to be the sole building erected in the City during the War.

2.2 In turn, that provides another maritime link, this time with Liverpool Street station. The Netherlands' neutrality in the First World War allowed North Sea ferry services to continue, albeit resented by Germany. Amongst the refugees and occasional business passengers were those of more clandestine intent. Dutch operators' eventual withdrawal from the crossing then left only the Harwich-Rotterdam sailings by the Great Eastern Railway Steamship Company. One of its captains was Charles Fryatt of the Mercantile Marine, renamed as the Merchant Navy in 1928. Several times from March 1915, German submarines ordered Fryatt to stop his unarmed ship but instead he made to ram the U-boats or outran them, outraging Germany. Around 0300 on 22nd June 1916, German naval vessels stopped Fryatt and the SS Brussels outbound to Harwich. The ship, 45 crew, including five stewardesses, and 100 refugee passengers were taken to Bruges and interned. On 27th July, two hours after a summary court martial, Fryatt, despite being a civilian non-combatant, was shot by firing squad. On 7th July 1919, Fryatt's body was repatriated by Royal Navy destroyer, escorted by two more, to Dover and by train to Charing Cross. The purple-lined luggage van used had served previously for nurse Edith Cavell's coffin and in 1920 for that of the Unknown Warrior. On 8th, Fryatt's coffin was drawn by Royal Navy ratings on a gun carriage, a State funeral honour, to St Paul's for the service, hundreds of thousands lining the streets. The burial was in Dovercourt, Harwich, Fryatt's home. A hospital and pub there bear his name but reaction to what so many newspaper headlines declared as his *'murder'*, finds it too in Belgium, the USA, South Africa, Mauritius, Australia and New Zealand. In the Canadian Rockies, Mount Fryatt is close to Brussels Peak, named after his ship, while his memorial is on Liverpool Street station. Unusually for the First World War period, Fryatt's portrait appears on this in bronze relief. Beneath, the dedication reads *'From the neutral admirers of his brave conduct and heroic death. The Netherlands section of the League of Neutral States July 27th 1917.'* More than Holland House's architectural features would be lost were this application approved.

3. BACKGROUND

3.1 For the Corporation to envisage not just once but twice such a threat as the Bury Street development to the Bevis Marks Synagogue, one of the City's most historic buildings and of international significance, more than questions its apparent commitment to protect its heritage. Adding colour, charm and character to the City, heritage is an asset which also adds interest, attracts visitors and earns revenue and respect. Albeit seeming to share those aims, Destination City appears limited in its vision. While the HCMM might be expected to champion maritime heritage, within it are the City's origins too yet it ignores them. Visiting Tower Bridge from the City means crossing Tower Hill whereon The Merchant Navy Memorial. Initially unveiled in 1928, The Times' then described its location as *'at the hub, as it has been said, of maritime England '*. Similarly, when unveiling the Second World War section in 1955, HM The Late Queen said *'It is fitting that in this place, which for centuries has been at the very heart of the maritime life of our nation, there should stand this memorial…' Even* TfL recognises its importance by naming it on its Legible London maps in the vicinity, including in the City. TfL each November further honours the 36,000 commemorated on The Merchant Navy Memorial when Tower Hill becomes one of the ten stations replacing the standard platform logo with the 'poppy roundel' in remembrance. Tower Hill is in Tower Hamlets. Why is the City Corporation, keen Tower Bridge should be visited, nonetheless unwilling to mention another borough? Might it be a reminder that the heritage within the City belongs to more than the Corporation?

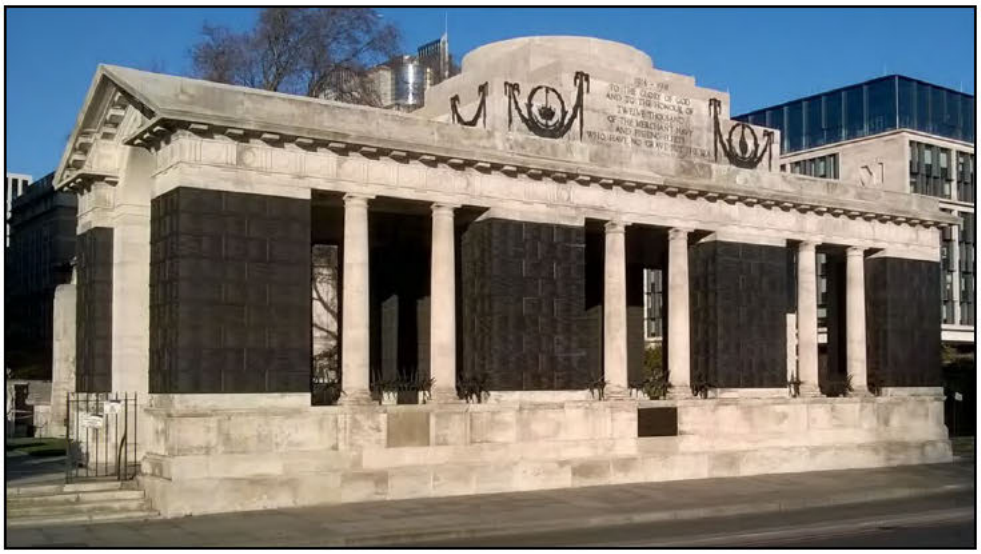
This example being from Great Tower Street, TfL Legible London Monolith maps in the Tower Hill area name The Merchant Navy Memorial.



Tower Hill is one of ten stations on the Underground where the 'poppy roundel' replaces the standard logo each November.

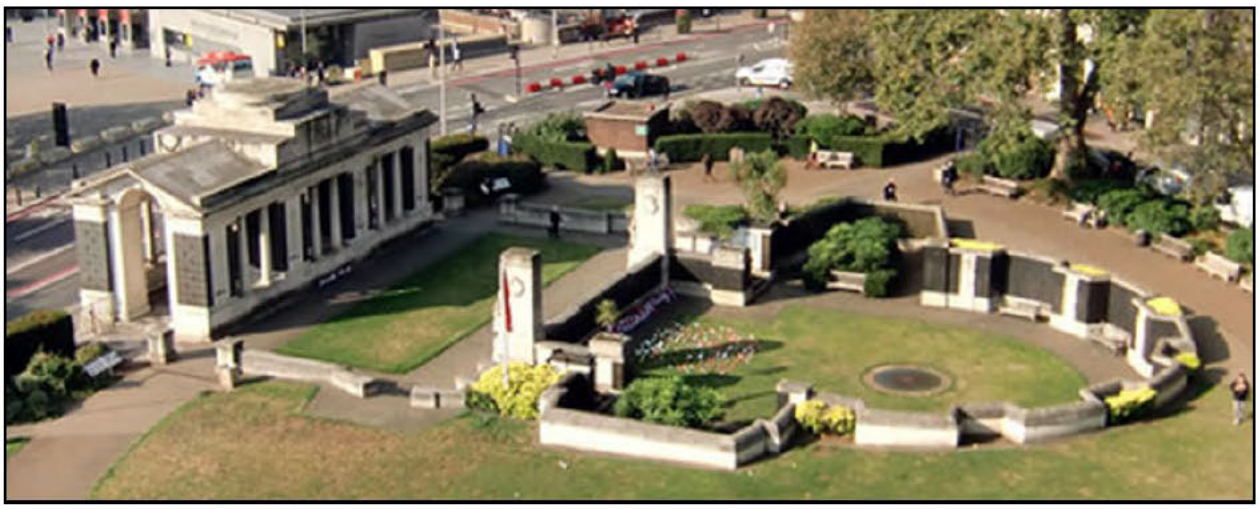


3.2 Of no less international significance than the Bevis Marks Synagogue is The Merchant Navy Memorial which is both Grade I and II*-listed. In Trinity Square Gardens on Tower Hill, it is thus within the Local Setting Area of the Tower of London World Heritage Site and a Conservation Area. As in representations opposing the original No. 31 Bury Street application and 'The Tulip' appeal, the HCMM would not wish to see the revised development dwarfing and diminishing Trinity Square, its Gardens, memorials and the associated Trinity House, Grade I, and Ten Trinity Square, Grade II* as well as the Tower itself.

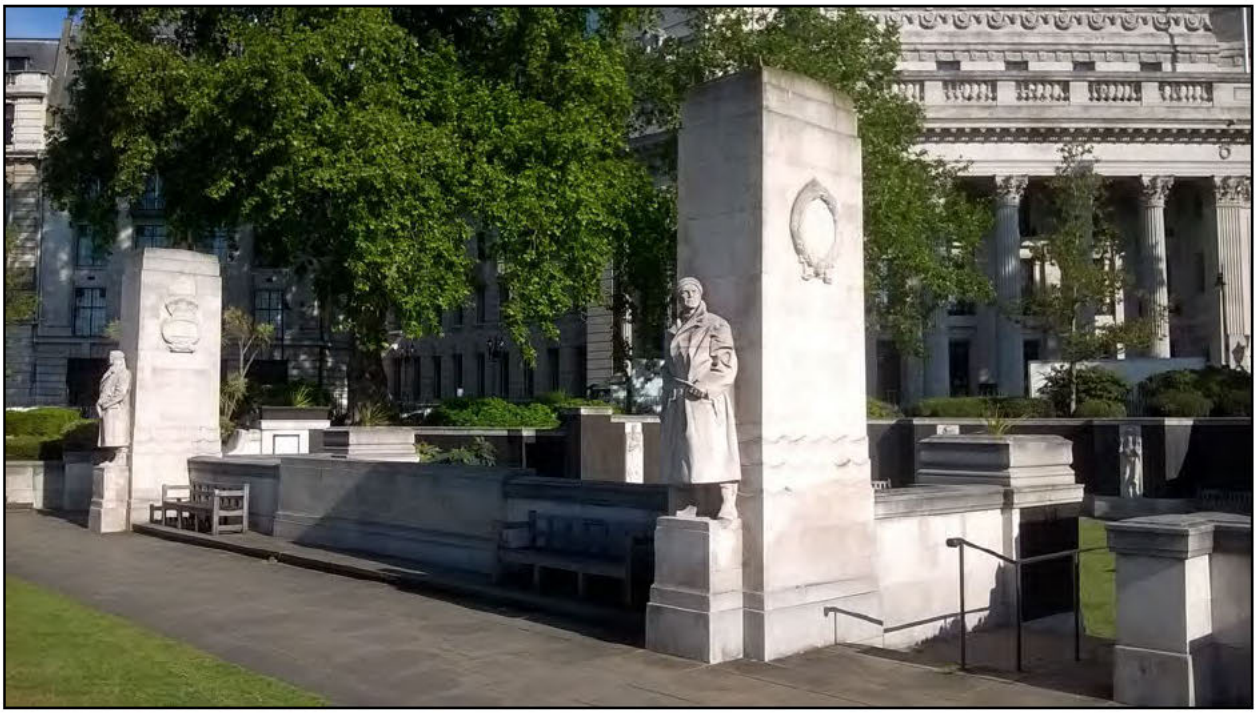


The Merchant Navy Memorial's First World War section's south elevation from A100.

3.3 'The Times' in 1928 described the area as *'...at the hub, as it has been said, of maritime England'* in reporting on the unveiling by HM Queen Mary of The Merchant Navy Memorial. It is now its First World War section. Similarly, in 1955 when unveiling its Second World War section, HM The Late Queen spoke of *'...this place, which for centuries has been at the very heart of the maritime life of our nation...'*. On Tower Hill, The Merchant Navy Memorial is thus the focal point of that maritime history and heritage. It bears some 36,000 names, more than any other Commonwealth War Graves Commission memorial in the UK. Lost in either of the two World Wars or Falklands Campaign, they are those of men and women, aged from 13 to 74 and of more than 100 nationalities who served under Britain's Red Ensign and who have no grave but the sea. Two, Captains Frederick Parslow and Archibald Smith, were the final civilian recipients of Britain's highest military decoration, the Victoria Cross. The Mercantile Marine's rôle in the War was decisive in keeping Britain fed and fighting. Had it not been for the introduction of the convoy system in May 1917, Britain would have been starved into capitulation within six months. In this context, it should be noted that convoys of British merchant ships escorted by Royal Navy vessels had been a feature of the Napoleonic Wars of 1803-1815. In 1928, The Mercantile Marine's service and sacrifice over *'many centuries'* was recognised by HM King George V, conferring upon it the title 'Merchant Navy'. HRH The Prince of Wales then was appointed Master of the Merchant Navy and Fishing Fleets, a position held since held by successive Sovereigns.



The Merchant Navy Memorial Second World War section in the foreground, the wreaths and, in the grass, miniature Red Ensigns result from the Merchant Navy Day service in September 2016.



The Merchant Navy Memorial Second World War section, seen from Trinity Square Gardens

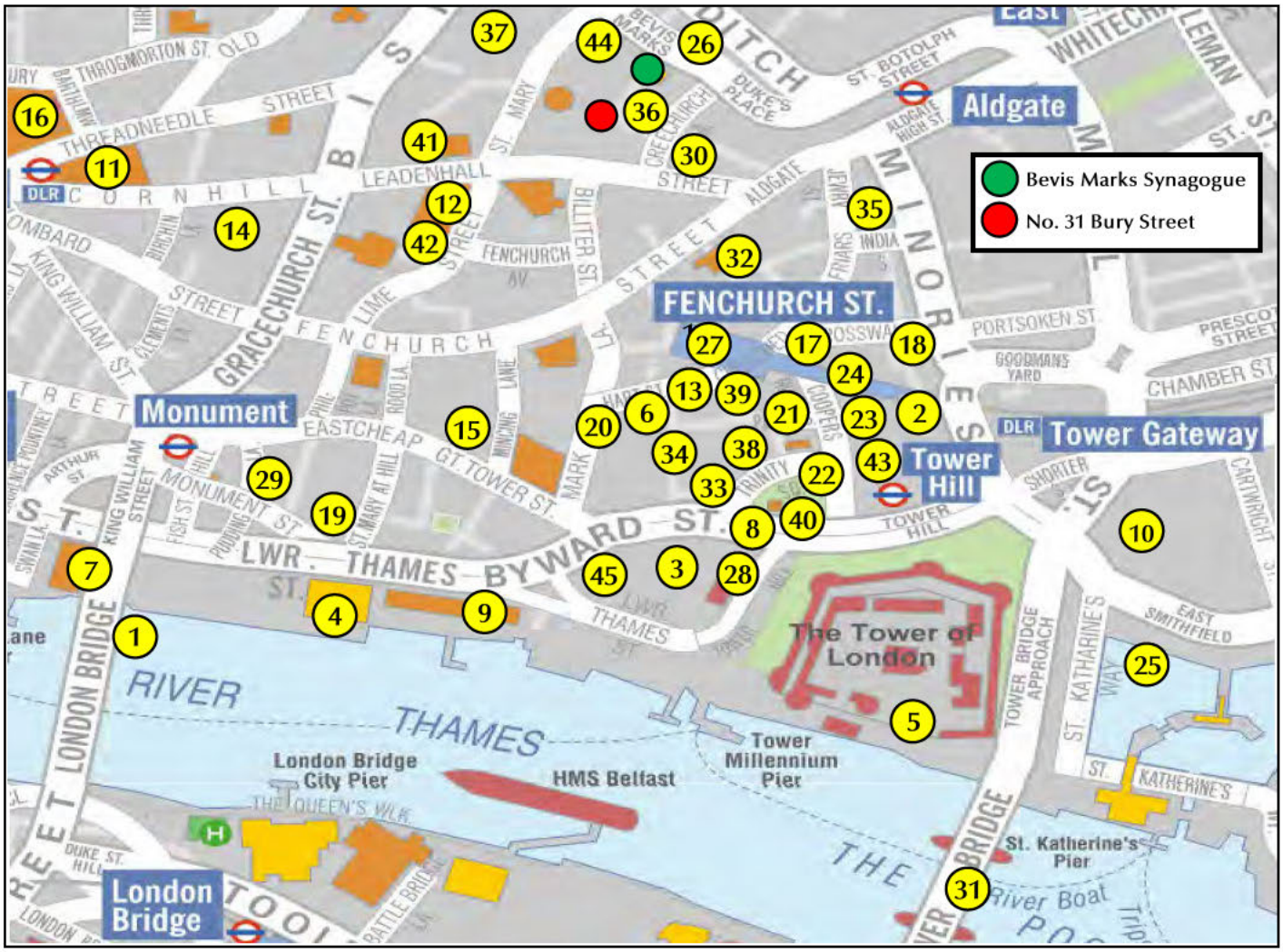
3.4 Rather than overshadow the adjacent First War section, designed by Sir Edwin Lutyens, the bronze panels of Sir Edward Maufe's design, Sir Charles Wheeler being the sculptor, are semi-recessed in the lawn of Trinity Square Gardens. Together with their 2,174 ships recorded, the names of the men and women commemorated, their ages ranging from 14 to 74, tell the story in particular of the longest continuous campaign of the War. On 3rd September 1939, 8hrs 25mins after war had been declared, the unescorted SS Athenia was torpedoed around 200 miles northwest of Ireland. Bound for Montreal, the liner had called at Belfast and Liverpool after leaving Glasgow. 1,418 were on board, 1,103 being passengers of whom three-quarters were women and children, all trying to escape imminent war. The Athenia sank slowly, allowing survivors to be rescued but the lives of 112 British, American and Canadian passengers and crew were lost, the first of the War. By an accident of the alphabet, the 18 crew members' names appear alongside two from the SS Avondale Park, a cargo vessel torpedoed on 7th May 1945, 1hr 20mins before VE-Day, the end of the War in Europe. Between them, the first and last British ships sunk, the Memorial bears witness to the five years, eight months and four days of which Prime Minister Winston Churchill, wrote, *The Battle of the Atlantic was the dominating factor all through the War. Never for one moment could we forget that everything happening elsewhere, on land, at sea or in the air depended ultimately on its outcome and amid all other cares we viewed its changing fortunes day by day with hope or apprehension.'* During the Second World War, some 37,000 men and women of the Merchant Navy were killed, the majority in the Battle of the Atlantic. It represents a greater proportion, 20%, of its strength than that of any of the individual Armed Services. Other CWGC memorials honouring British Merchant Navy members whose grave is the sea are in Canada; Liverpool; India; Bangladesh; Hong Kong; Papua New Guinea; Australia and New Caledonia.



3.5 Unveiled in 2005 by the First Sea Lord, Admiral Sir Alan West, the Falklands Campaign section of the Memorial commemorates 17 men of the Merchant Navy lost in 1982 who have no grave but the sea. Supporting those of the Royal Navy, more than 70 Merchant Navy and Royal Fleet Auxiliary ships were involved, the latter being crewed by members of the Merchant Navy .

3.6 The Rt Hon Michael Gove MP, Secretary of State for the Department for Levelling Up, Communities and Housing, refused permission for construction of 'The Tulip' in 2021. A 305m/1002' high observation gallery, it would have dominated Trinity Square. The HCMM, amongst many others, objected. Grounds for refusal were excessive use of embedded carbon and harm to heritage with The Merchant Navy Memorial and other maritime sites mentioned. The Secretary of State's decision was published on 11th November, Armistice Day. The Planning Inspector also noted that the development would have amounted to an unwelcome eastward extension of the City's Eastern Cluster. The No 31 Bury Street development would be such an eastward extension, prompting the concern that it would set a precedent.

4. Sites of principally maritime significance in the area of No. 31 Bury Street EC3



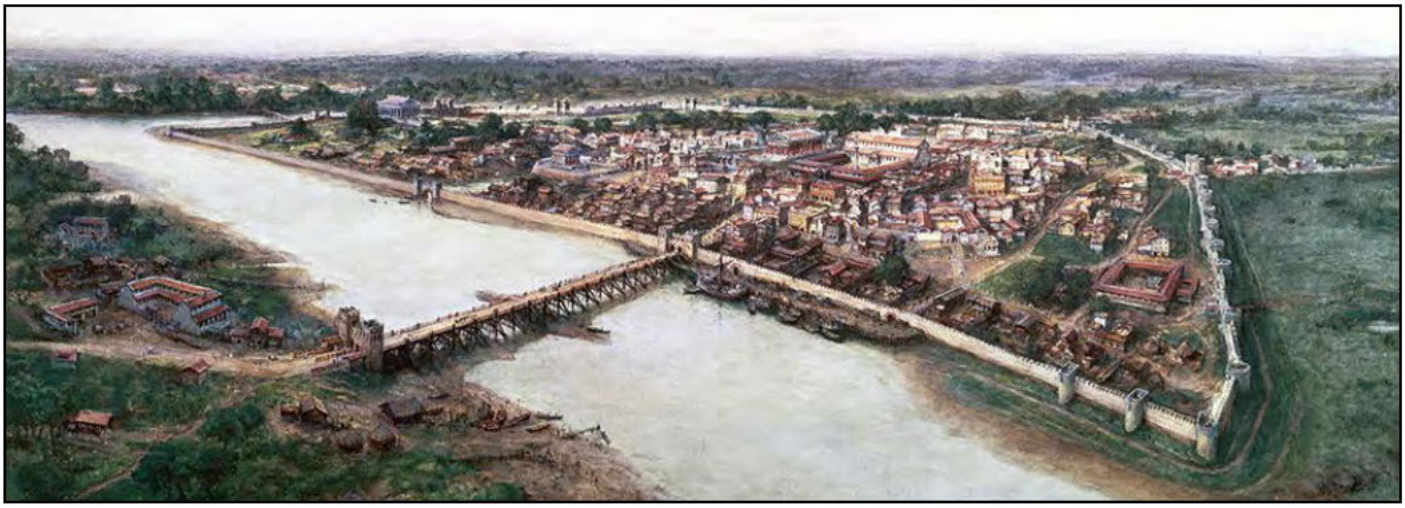
1.	London Bridge 55AD	Grade II-listed	24.	No. 41 Trinity Square early 19c.	Grade II
2.	London Wall 200AD	Grade I	25.	St Katherine's Dock 1828	Grade II
3.	All Hallows by the Tower 675AD	Grade I	26.	M. Samuel & Co 1833	
4.	Billingsgate Market 1016	Grade II	27.	Fenchurch Street Station 1841	Grade II
5.	Tower of London 1078	Grade I	28.	Mazawattee Tea Company 1864	
6.	St Olave's Church 11c.	Grade I	29.	W. Young & Son 1890	
7.	Fishmongers' Hall 1310	Grade II*	30.	2-16 Creechurch Lane 1885	Grade II
8.	Tower Hill Memorial 1381		31.	Tower Bridge 1894	Grade I
9.	Custom House 1382	Grade I	32.	Lloyd's Registry 1901	Grade II*
10.	Navy Victualling Yard 1560		33.	Nos. 14 & 15 Trinity Square 1909	
11.	Royal Exchange 1571	Grade I	34.	Muscovy Street 1912	
12.	East India Company 1600		35.	India Street 1913	
13.	Navy Office 1649		36.	Holland House 1916	Grade II*
14.	Jamaica Wine House 1652	Grade II	37.	Captain Charles Fryatt MM Memorial 1917	
15.	Lloyd's Coffee House 1686		38.	Port of London Authority building 1922	Grade II*
16.	Bank of England 1694	Grade I	39.	Pepys Street 1923	
17.	Cooper's Row 1750		40.	The Merchant Navy Memorial 1928/1955/2005	G I & II*
18.	America Square 1774		41.	Nortraship 1940	Grade II
19.	Watermen's Hall 1780	Grade II*	42.	Lloyd's Building 1986	Grade I
20.	'The Ship' 1791	Grade II	43.	Wakefield Gardens 1992	
21.	Trinity House 1796	Grade I	44.	Baltic Exchange 1995	Grade II
22.	Trinity Square Gardens 1797		45.	Malta GC Memorial 2005	
23.	No. 43 Trinity Square 18c.	Grade II			

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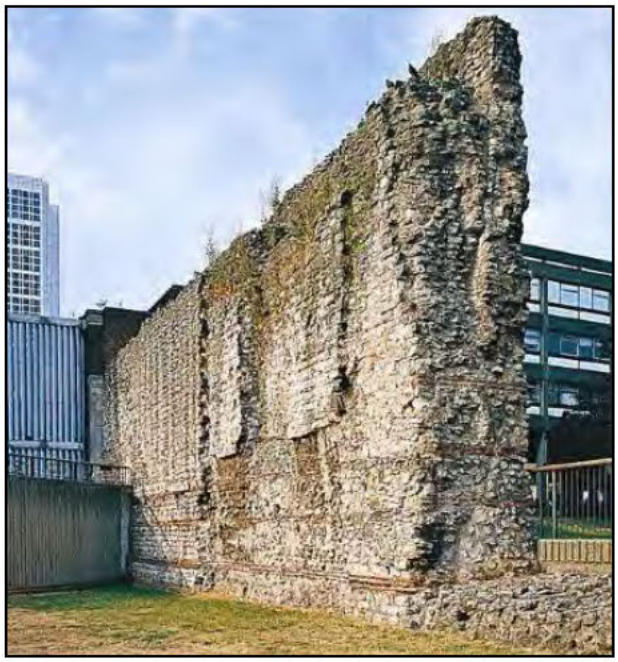
5. Notes on significant heritage sites in the EC3 area

1. London Bridge 55AD

London was built on the sea and trade. The initial settlement was centred around the point at which a seam of gravel allowed the Thames, then shallower and far wider since not embanked, to be forded, giving access from the marshy south bank to the north with its two low hills, now Ludgate Hill and Cornhill. Immediately downstream of the ford, deeper water allowed access by vessels already trading with the Continent before the arrival of the Romans - by sea - in 43AD. Developing trade further and establishing Londinium in 55AD the Romans built a wooden bridge at the fording point from near Billingsgate across to what is now Southwark. The location closely corresponds to today's London Bridge. To protect their burgeoning city, the Romans then built a defensive wall around it between 190 and 225AD as shown below (**See 2.**). After the Romans departed Britain around 410AD, the bridge fell into disrepair and much of Londinium was abandoned, settlement moving westward to the area of what is now the Strand and Aldwych. It was in 886AD that King Alfred re-established English rule in London, repairing the Roman wall, its defensive outer ditch and replacing the bridge. Viking invasion being the threat, the bridge had a defensive rôle in blocking access upstream. Utilising the Roman piles, the bridge thus was replaced around 900AD and again around 1056. Then, it was built of wood. Construction of the first stone London Bridge began in 1176, the 19-arched structure remaining in use until 1832. It was the only bridge in London until 1750 and the opening of Westminster Bridge. It was around this time too that the term 'Pool of London' began to be used, that deeper water downstream from the bridge that gave access to the world. '*Their metropolis is the city of London, which is situated on the bank of the aforesaid river, and is the mart of many nations resorting to it by sea and land.*' noted the Venerable Bede in the 7th century.



2. London Wall c. 200AD



Alongside Tower Hill station is one of the more prominent surviving sections of London Wall. Built by the Romans in 190-225AD, it ran in an arc inland from Tower Hill to Blackfriars, a length of 2½ miles. As shown above with the river Fleet to the west, it protected Londinium's 330 acres/133 ha and was built also as a sign of the city's status. Kentish ragstone was used, 1,750 boatloads being brought via the Medway from near Maidstone. The names Ludgate, Newgate, Bishopsgate, Cripplegate and Aldgate live on from former access points in the Wall. Saxon raids from boats led in 280AD to adding a section along the Thames shoreline. At Tower Hill, the Wall is 11m/35' tall, the lower 4m/14' being Roman as evidenced by the red tiles, the addition above being mediaeval. Thickness varied from 2.4m/8' to 3m/10'. Around the outside of the Wall ran a defensive ditch, 2m/6' deep and up to 4.5m/15' wide. Demolition of the Wall or incorporation into new structures began in the 18th century. Immediately north of this section, more of the Wall remains in Cooper's Row (**See 17.**). Grade I-listed and a Scheduled Monument.

3. All Hallows by the Tower 675AD



All Hallows by the Tower is the oldest church in the City of London, founded by the Abbey of Barking in 675AD. Grade I-listed, it houses an arch from a Saxon church and a section of Roman pavement. William Penn, founder of Pennsylvania, was baptised in 1644 and educated in the church; John Quincy Adams, the USA's sixth President, was married within it in 1797. The bodies of Sir Thomas More, Bishop Fisher, Archbishop Laud and others were taken to the church after execution on Tower Hill **(See 8.)**. The church has maritime links with shipping companies' coats of arms set in windows and a Mariners' Chapel. Together with votive ship models, this holds the Memorial Book of the Maritime Foundation. The Rev Philip 'Tubby' Clayton, vicar from 1922 to 1962, was an Army chaplain in the First World War and in 1915 founded Talbot House, 'Toc H', an all-ranks soldiers' club at Poperinge in Belgium. During the Second World War, as honorary chaplain to the Anglo-Iranian Oil Co, now BP, he often sailed on its tankers between the UK, Gulf and back: 44 of the company's 93 ships were lost to enemy action together with 657 crewmembers. Clayton remains in the church, his effigy in the nave and ashes in the undercroft, and through the Tower Hill Improvement Trust which he co-founded, its president being Viscount Wakefield. They were neighbours at Nos. 41 and 43 Trinity Square. **(See 22.,23., 24. & 28.).**

4. Billingsgate Market 1016



Whilst the earliest documentary evidence of the Market's existence is from 1016, it dealt initially in corn, salt, malt, fish, coal, iron, wine, pottery and more with *'victuals and fruit'* later added. A 1698 Act allowed *'a free and open market for all sorts of fish whatsoever'* breaking the monopoly of a fishmongers' group upriver at Queenhithe. Wooden sheds grouped around a dock were replaced in 1850 by a trading hall, in turn replaced by the present structure in 1876. This was designed by the City Corporation's Architect, Sir Horace Jones, who was responsible also for the Smithfield and Leadenhall Markets as well as Tower Bridge **(See 31.)**. Limitations of the building forced the Market's transfer to a new site on the Isle of Dogs in 1982, Billingsgate now being a function venue and Grade II-listed.

5. Tower of London 1078



The White Tower, the keep of the fortress, was constructed in 1078. It provided the Normans, invaders from the sea, not only a means of keeping check on the City to the west but, sited on a strategic bend in the Thames, guarded against attack upriver from the sea. A prison and the place of execution for royalty while those of lesser rank would be taken from imprisonment within to the scaffold on Tower Hill **(See 8.)**. Samuel Pepys **(See 13. & 39.)** was held in the Tower in 1679, accused of passing naval secrets to the French. The charges being fabricated however, Pepys was released after six weeks. The last state prisoner to be held within was Rudolf Hess in May 1941; its last execution was of the German spy Josef Jakobs on 15 August 1941, while the Kray twins were among the last people to be held in the Tower, this in 1952 for failing to report for National Service. Grade I-listed, the Tower is a UNESCO World Heritage Site.

6. St Olave's Church 11c.



King Ethelred the Unready, deposed by Danish invasion in 1013, fought to reclaim his kingdom in 1014, with London and its fortified, guarded bridge **(See 1.)** his first objective. He had the support of Thorkell the Tall and his 45 longships. Óláfr Haraldsson, a Norwegian in Thorkell's Viking army, led longships fitted with 'roofs' of thatch or wicker to protect against the defenders' spears, arrows and large stones, upstream to the wooden bridge. To it, the crews attached grappling irons and ropes from their ships and then rowed to bring down the bridge beneath its weight of troops and piles of stones. The Danes' surrender restored London and his kingdom to Ethelred. Returning to Norway, Haraldsson became its king in 1016 or 1018 but was ousted by Cnut who had seized the English throne in 1016, Denmark's in 1018 and Norway's in 1028. Trying to regain his crown, Haraldsson died in battle in 1029 and after his burial, miracles attributed to him lead to canonisation. Anglicised as St Olave and Norway's patron saint, six London churches were dedicated to him, this in Hart Street being built in wood in the 11th century on the site of the 1014 battle but rebuilt in stone in the 12th-13th; again around 1450 and extended in the 16th-17th. Untouched by the Great Fire of 1666, William Penn senior and Samuel Pepys **(See 13. & 39.)** demolishing buildings as firebreaks, it was gutted by bombing in 1941 but rebuilt in 1951-54. Pepys worshipped and is buried with his wife in the Grade I-listed church whose gateway prompted Dickens in 1860 to write of it as that of 'St Ghastly Grim'.

7. Fishmongers' Hall 1310



The Fishmongers' Company is one the 'Great Twelve', the oldest City of London Livery Companies. Founded in 1272, it has a key rôle in maintaining standards in fish and shellfish trading. Its philanthropic work includes support for the fishing industry and in other areas. The original Hall was replaced in 1434 but lost in the Great Fire while its 1671 successor was demolished so the new London Bridge could be built in 1827. Henry Roberts designed its replacement, opened in 1934. Severely damaged by bombing in 1940, it was restored by Herbert Austen Hall in 1943-1953. Grade II*.

8. Tower Hill Memorial 1381



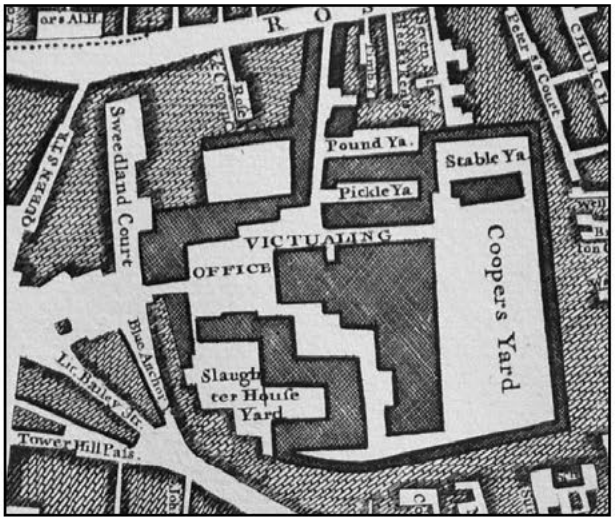
Tower Hill was the place of public execution of, principally, the nobility and gentlemen from 1381 to 1780, this usually following imprisonment in the Tower **(See 5.)**. The Memorial marks the site of the scaffold. Beheading was the customary means but burning at the stake as well as hanging, with or without drawing and quartering, also were used. 100,000 spectators were typical of these occasions. Arising from such as the Peasants' Revolt; Wars of the Roses; Lollardism; claims to the throne by Perkin Warbeck and Lambert Simnel; Reformation; Pilgrimage of Grace; Monmouth Rebellion; Jacobite Rising and the Gordon Riots, some 125 executions are chronicled, including those of Sir Thomas More, Lord Chancellor, and Thomas Cromwell, Lord High Chamberlain, beheaded for treason in 1535 and 1540 respectively. Lord Lovat's execution for high treason in 1747 was the last judicial beheading in England, the final executions here being hangings in 1780. The Memorial's present form is thought to date from 1955. **(See 22.)**.

9. Custom House 1382



Used for the collection of custom duties, the original 1382 building was located at Wool Quay, immediately downstream of the current Lower Thames Street site. Comptroller of the Customs of Wools, Skins and Tanned Hides at Wool Quay until 1386 was Geoffrey Chaucer. Following fires and an explosion, the Custom House was rebuilt four times before the David Laing's 1817 version occupied the present position but partial collapse in 1825 led to remodelling to Sir Robert Smirke's redesign. The work was completed in 1827 and Laing disgraced. Bomb damage on the night of 29th December 1940 led to the east wing being rebuilt in 1962-66. The Grade I-listed building was vacated by HMRC in 2020.

10. Navy Victualling Yard 1560



King Henry VIII, described as the 'Father of the Navy', increased its size tenfold and in 1546, established the Navy Board, one of its responsibilities being victualling. It was, however, his daughter, Queen Elizabeth I, who appointed in 1558 the first Surveyor General of the Victuals *'to take care always to have in store a stock of victuals to supply a thousand men at sea for one month at a fortnight's notice'.* In 1560 the Queen established the first Victualling Office and Yard at Little Tower Hill after purchasing the manor of East Smithfield and a former monastery for £1,200 (£618,500 in 2020). The complex included storehouses, ovens, brew houses and bakeries. Milling took place in Rotherhithe while most other supplies came from private agents. An extract of John Rocque's map of 1746 is shown. As the Royal Navy grew in size, the need for a larger site meant moving the Victualling Yard to Deptford and that at Little Tower Hill closed in 1785. The buildings became government warehouses before the Royal Mint transferred there from the Tower in 1806. The Mint moved to South Wales in 1980 and the site is to become that of the Chinese Embassy. Within, the Seamen's Registry is Grade II*-listed.

11. Royal Exchange 1571



Sir Thomas Gresham, a merchant and member of the Mercers' Company traded in the Low Countries while the English Merchant Adventurers already had a headquarters in Antwerp. Believing a place for merchants and traders to meet instead of discussing business in the street would benefit the City and beyond, Gresham cited Antwerp's bourse in proposing one for London. Construction began in 1566 of an open courtyard ringed with galleries of small shops. Opened in 1571 by HM Queen Elizabeth I who conferred upon it the 'Royal' prefix. Soon showing its value for business, it was destroyed in the Great Fire in 1666 and its replacement opened in 1669. Letting the shops proving difficult, occupying much of the building during the 18th century were such as Royal Exchange Assurance; Lloyd's; and the East India Company, storing pepper in the vaults. Fire in 1838 meant a third building. Designed by Sir William Tite, it was opened in 1844 by HM Queen Victoria. Effectively closed in 1939, it was occupied later by Guardian Royal Exchange Assurance before becoming an exhibition centre with the courtyard roofed in 1990. The Royal Exchange reopened with luxury shops and offices in 2001.

12. East India Company 1600



The Royal Charter granted by Queen Elizabeth I on New Year's eve in 1600 gave a monopoly on English trade between the Cape of Good Hope and Magellan's Strait to the *'Company and Merchants trading to the East Indies'*. Initially occupying offices in its first Governor's Philpot Lane home, then Crosby Hall in Bishopsgate, followed by another Governor's home in Lime Street, it moved next door in 1648 to Craven House in Leadenhall Street. Becoming East India House, this was replaced on the site by larger and grander successors in 1729 and 1796 as shown. Becoming the world's largest commercial business, the Company changed Britain's use of wool for cotton and established the drinking of tea while swinging the balance of world trade in Britain's favour, aided by its private navy and army. Excesses however led to the Indian Mutiny of 1857, the Company being stripped of its powers and the Government establishing the British Raj in 1858. East India House was demolished in 1862, the Lloyd's Building now occupying the site. **(See 15., 28., 32. & 42.)**

13. The Navy Office 1649



From 1649 the Navy Board with a staff of some 60 clerks, occupied Walsingham House, formerly Sir Francis Walsingham's mansion, at the corner of Crutched Friars and Seething Lane. Lost in a fire in 1673, it was rebuilt by Sir Christopher Wren as shown and reopened in 1683. This new Navy Office provided living accommodation for the Commissioners and offices for various departments. The rear wing had its own entrance on Tower Hill and housed the Sick and Hurt Board. The Navy Treasury, also known as the Navy Pay Office, was located from 1664 in Old Broad Street, moving there from Leadenhall Street. Initially as Clerk to the Acts of the Navy Board, Samuel Pepys **(See 5., 6., 21. & 39.)** lived on the Crutched Friars site in a Seething Lane house opposite St Olave's **(See 6.)** from 1660 to 1673. Pepys significantly improved the standards of Navy administration and procurement. In 1789, all of these departments were relocated to Somerset House, the Navy Office then being demolished.

14. Jamaica Wine House 1652



While it is suggested that England's first coffee house had appeared in Oxford in 1651, this was the first in London, opened in the following year by Pasqua Rosée. Born in Dalmatia, now Croatia, he moved to Syria where he met a merchant Daniel Edwards, a Levant Company member and trader in Turkish goods. Employing Rosée as a manservant, Edwards brought him back to England together with a taste for Arabic coffee. At the time, that of Cromwell and Puritanism, alcohol consumption was discouraged so coffee soon became popular in the City, being restorative unlike the alternatives. The original premises were a 'shed' in the churchyard of St Michael's Cornhill. Proclaimed by a sign carrying Rosée's portrait, it wasknown as 'The Sign of Pasqua Rosee's Head' or 'The Turk's Head'. Moved nearby to the site of the present Grade II pub, the Jamaican link stems from Britain acquiring the colony in 1655, its sugar and slaves being subjects for discussion by traders meeting at the establishment. Pascal Rosée moved to Paris, opening the city's first coffee shop on the Place Saint-Germain in 1672.

15. Lloyd's Coffee House 1686



London's coffee houses were known already as places for serious discourse and business when in 1686, Edward Lloyd opened his in Tower Street, now Great Tower Street. Attracting shipowners, captains, merchants, bankers and later marine insurers, success brought a move in 1691 to No. 16 Lombard Street where in 1696, Lloyd began publishing 'Lloyd's News', a thrice-weekly bulletin of shipping news, movements, cargoes and foreign events. It lasted only some five months however due to the printer adding an unrelated libellous piece unbeknown to Lloyd whose growing list of contacts abroad nonetheless ensured the continuance of maritime intelligence for his patrons. On Lloyd's death in 1713, Thomas Jemson became proprietor and in 1734, he introduced 'Lloyd's List', a weekly shipping news bulletin. Concern for vessel build standards and safety led patrons to form the Society for the Registry of Shipping in 1760. Samuel Saunders then owned the coffee house and his death in 1763 began what the regulars considered its decline. The Society moved to No. 4 Sun Court, Cornhill, in 1768 **(See 31.)** while the merchants, underwriters and brokers opened the 'New Lloyd's Coffee House' at No. 5 Pope's Head Lane in 1769, promptly issuing the first edition of the 'New Lloyd's List'. In turn, the underwriters formed their own association, transferring to the Royal Exchange in 1774 (**See 11. & 42.**). Lloyd's Coffee House closed in 1785.

16. The Bank of England 1694



The Royal Navy's losses to the French at the Battles of Bantry Bay in 1689, Beachy Head in 1690 and Lagos Bay in 1693 left it in need of re-equipping. Hitherto, London's goldsmiths would have provided the necessary loans but experience of King Charles II in 1672 had left them unwilling or out of business. His successor, William III, was forced to consider new ways of raising capital to renew England's defences. The Government, wealthy merchants and nobility were consulted with the proposal of William Paterson, a Scottish merchant, chosen. Thus members of the public were invited to lend money to the Government with £1.2 million (£195,265,744 in 2024) being required. The sum was raised in 11 days by 1,268 members of the public, the Bank of England being formally established by Royal Charter on 27th July 1694. It opened on 1st August 1694 in temporary accommodation in the Mercers' Hall in Cheapside. Moving in 1734 to Threadneedle Street, its buildings designed by George Sampson and Sir John Soane were replaced in 1939 by that of Sir Herbert Baker which is Grade I-listed.

17. Cooper's Row 1750



Renamed from Woodruffe Lane in 1750 to reflect the local predominance of coopers and wine warehouses. First recorded in 2600 BC, the wooden barrel was the ISO container of the day, used on ships to transport grain, flour, fish, meat and more, not least liquids like water, wine or whale oil. Barrels' cost and weight, leakage, space, limitations on reuse and time needed for loading and unloading a ship told as demand for petroleum developed. The tanker resulted, replacing holds with tanks for liquid cargo. The first were the barques 'Great Western' and 'Atlantic' built in 1863 by John Rogerson & Co on the Tyne. **(See 25.)**. While this dispensed with the barrel, the term remains as the unit of measurement for petroleum products and in 1866 was standardized at 42 US/35 Imperial gallons.

18. America Square 1774



Designed by George Dance the Younger for the developer, Sir Benjamin Hammett, based on Grosvenor and Cavendish Squares, the 16 houses of America Square were aimed at a similar market. Construction began in 1768, before the American War of Independence, and took six years. Both merchants and ships' masters engaged in American trade became residents. South of the Square, the Crescent and the Circus formed part of the scheme but Second World War bombing led to redevelopment of the Square.

19. Watermen's Hall 1780



The Company of Watermen and Lightermen of the River Thames is unlike other former City guilds in originating from an Act of Parliament in 1555. Unique in being so instituted and governed, it is not responsible to the City Corporation and thus has the distinction of being a Company without livery. London Bridge (**See 1.**) being the city's only Thames crossing until the advent of Westminster Bridge in 1750, watermen with their wherries provided the taxi service of the day, they being hailed with a cry of 'Oars!'. Hence Tudor London had about 30 landing places - 'steps' or 'stairs' giving access to the river - between the Tower and Westminster. In 1598, there were some 3,000 watermen with 2,000 boats, London's population then being around 200,000. By 1746, there were more than 100 landing places between Chelsea and Shadwell, the city's population approaching 750,000. That it took until 1750 for London to have a second bridge is due in part to watermen's opposition. Sedan chairs and hackney carriages were opposed too, as was the permitting of theatres to transfer from Southwark to the City, all designed to protect the trade. Its decline was inevitable however in the face of alternatives such that by 1827 London had seven bridges and only around 66 river stairs still in use. Watermen now crew the vessels used on the rivers services and leisure cruises. A lightermen's concern is not passengers but cargo, a lighter being a barge used to transfer it from ship to shore or for moving it within docks. Unpowered, a lighter was steered by oars, the waterman's skill being in utilising the river's tides and currents. The introduction beginning in the 19th century of enclosed docks and then the ISO container in the 1960s mean that few lightermen operate on the Thames today, their lighters now being towed by tugs. Originally, the Company's hall was in Upper Thames Street but it was lost in the Great Fire of 1666, being rebuilt in 1670 and 1720. Designed by William Blackburn, its present hall at 16 St Mary-at-Hill was built in 1780 and is Grade II*-listed. It is the only surviving Georgian guildhall in London.

20. 'The Ship' 1791



Pub closures nationwide have reduced their numbers so those in EC3 with maritime trade connections are fewer too. Gone therefore are 'Anchors' various; the 'Cape of Good Hope'; 'Bengal Arms'; 'Coopers' Arms'; 'Czar's Head'; 'Fishmongers' Arms'; 'India Arms'; 'Margate Hoy'; 'Ipswich Arms'; 'Steam Boat' and 'Yarmouth Arms'. Nonetheless, the 'East India Arms' **(See 12. & 28.)** and 'Old Tea Warehouse' remain as do two of some eight named as here. At No. 3 Hart Street, this 'Ship' was first recorded in 1791 but the present façade dates from 1887 and the building is Grade II-listed. The other 'Ship' in EC3 is in Talbot Court, on the site of 'The Talbot' lost in the Great Fire in 1666. Rebuilt, in recognition of the dock workers and deckhands who drank there, it was also renamed.

21. Trinity House 1796



The General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar, the Corporation of Trinity House was granted its Royal Charter in 1514 by King Henry VIII. During his reign, Trinity House became known as 'the cradle of the Royal Navy' as merchant ships evolved into warships. Transferring from Deptford in 1618, Trinity House moved first to Ratcliff, between Shadwell and Limehouse, and in 1660 to Water Lane between Lower Thames Street and the river. These premises were lost in the Great Fire in 1666 but the 1671 replacement was damaged in another fire in 1718. Repairs followed as did the move to the present building for which William Pitt, Prime Minister, laid the foundation stone in 1793; he was then also the Master of Trinity House. Designed by Samuel Wyatt, the Grade I-listed building was constructed in 1794-6, giving its name to the square and gardens laid out by Wyatt to complement it in 1797 **(See 22.)**. The Corporation's rôle continued in both World Wars, including laying 73 buoys across the Channel for D-Day. Albeit badly damaged by an incendiary bomb on 29th December 1940, the building remains its headquarters. Samuel Pepys **(See 13. & 39.)** was Master in 1676 and 1685, the appointment being held now by HRH The Princess Royal.

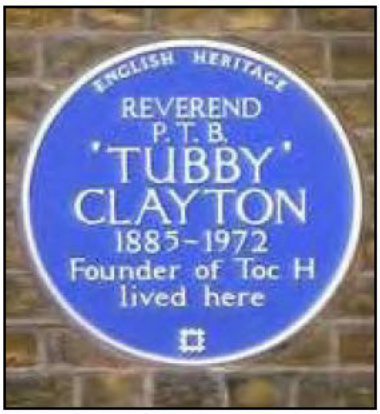
22. Trinity Square Gardens 1797



The final executions on Tower Hill **(See 3., 5. & 8.)** having taken place in 1780, Samuel Wyatt laid out the Gardens on the site in 1797 to complement his Trinity House design **(See 21.)**. Originally, only subscribers from around the Square had access to the Gardens, depicted here in 1821. Nonetheless, mass meetings of striking dock workers were held there in 1911 and 1912, as well as of 4,000 in support of the Poplar Rent Strike in 1921 and of the General Strike of 1926. Harry Gosling, was prominent at them all, initially as a trade union leader then as Labour MP from 1923 for Whitechapel and St George's in Stepney. Gosling, a former waterman **(See 19.)**, introduced to the Commons in 1926 a Bill calling for a memorial to Mercantile Marine members killed in 1914-18. The Service by then renamed, the Merchant Navy Memorial was unveiled by HM Queen Mary in 1928 **(See 40.)**, joining in the Gardens the Tower Hill Memorial **(See 8.)**.

23. No 43 Trinity Square 18c.





Grade II-listed, No. 43 is the vicarage for All Hallows by the Tower, the Reverend Phillip 'Tubby' Clayton being the incumbent from 1922 to 1962 **(See 3)**. With Dr Bertram Leftwich in 1933, he published 'Pageant of Tower Hill' which '*outlined a scheme to improve Tower Hill by removing from it certain ugly buildings which at that time disfigured it and hampered its use..*' The Tower Hill Improvement Fund's formation followed, buying and demolishing buildings to provide gardens and public open spaces as well as importing 1,500 barge-loads of sand for a Tower Bridge beach in 1934. Very popular, it continued until 1939, and post-war until 1971. The Fund is now the Tower Hill Trust which continues to support projects in Tower Hamlets, providing most of the funding in 2002-3 for the restoration of Trinity Square Gardens **(See 22., 24. & 28.)**.

24. No. 41 Trinity Square early 19c.





A plaque on his former house depicts, beneath a Toc H lamp, Viscount Wakefield of Hythe (1859-1941) who gave the Grade II-listed building to the church and local people in 1937. Charles Wakefield was an oil broker and in 1899 set up his own firm, C C Wakefield & Co., headquartered at Nos. 30-34 Cheapside. Specialising in lubricants, their use of castor oil leading to the 'Castrol' brand name. That name became wider known in the 1920s and '30s through Wakefield's financial support for the pioneering flights of Amy Johnson, Jean Batten and Sir Alan Cobham as well as for the setting of new land and water speed records by Sir Henry Seagrave, Sir Malcolm Campbell. and George Eyston. A remarkable philanthropist, Wakefield was created a baron in 1930 and viscount in 1934. As Lord Mayor of London, he visited the Western Front in 1916, a link furthered with his neighbour in No. 43, the Reverend 'Tubby' Clayton, vicar of All Hallows **(See 3.)** Clayton inspired the formation of the Tower Hill Improvement Fund, then Trust, of which Wakefield was president: he donated to it £30,000 in 1936 (£1.8 million in 2024). It bought and demolished buildings to provide gardens and public open spaces in the locality. **(See 22., 23. & 28.)**

25. St Katherine's Dock 1828



The ending of dock monopolies in the 1820s, especially that of nearby London Docks in Wapping, encouraged the development of a site nearer the City. Designed by Thomas Telford, St Katherine's Dock opened in 1828. Its twin basins with a common entrance from the Thames maximised quay frontage while its warehouses were designed by Phillip Hardwick so vessels could unload directly into them. Indian tea, wool from Australia, New Zealand and the Falkland Islands as well as exotic items like ivory, china, ostrich feathers, spices, tortoiseshell, mother of pearl, oriental carpets and perfume ingredients were amongst the imports in which the Dock specialised. The increasing size of ships and the Dock's limitations made operations uneconomic however and it closed in 1968. Grade II-listed, it is now a marina and residential, hotel, business and restaurant complex.

26. M Samuel & Co 1833



Marcus Samuel began business at No. 13 Upper East Smithfield **(See 10.)**, selling curios and seashells bought from arriving ships. Conchology was a fashion, shells covering trinket boxes through to lining grottoes. M Samuel & Co was established at No. 31 Houndsditch by 1833, selling imported ornaments, toys and more but known best as 'The Shell Shop'. Often visiting the Far East, sourcing products and building a network of contacts he widened his scope by importing tin and selling machinery to Japan. He died in 1870, two sons, Marcus and Samuel, taking on the business and network. The shell trade continued but they also exported industrial plant and textiles while importing rice, consumer goods and minerals. Oil soon had their attention. Marcus visited Baku on the Caspian in 1890 where kerosene or paraffin for lamps came from the first well drilled in 1847. He saw potential but a transport problem too. The first tankers were at sea but for safety reasons barred from the Suez Canal which had opened in 1869. Sailing from the Black Sea to the Far East via the Cape of Good Hope meant 4,000 more miles. Further, emptied oil tanks were unfit for other cargo so ships returned empty. The Samuels commissioned a vessel to Lloyd's highest classification **(See 32.)** equipped for steam cleaning of its tanks. In 1892, it became the first tanker through the Canal, returning with rice and beating the Rockefellers, Nobels and Rothschilds. That ship was the 'Murex', the first of a fleet named after seashells operated by one now of the world's largest energy companies, Shell.

27. Fenchurch Street station 1841



The City's first railway station, Fenchurch Street opened in 1841. Sir William Tite designed it for the London & Blackwall Railway (L&BR) which offered a link between the City, the docks, shipyards and shipping services faster than the horse -drawn or river-borne alternatives. The seven other stations served on the 3½-mile route were Minories; Shadwell; Stepney; Limehouse; West India Docks and Poplar. Until steam locomotives were introduced in 1849, carriages were rope-hauled, the power provided by stationary steam engines at the Minories and Blackwall stations. Stations and junctions with other companies' services were added but the advent of the tram at the start of the 20th century ended the L&BR's passenger services in 1926. Grade II-listed, the present façade is that of the 1854 remodelling by George Berkeley. The station is managed now by c2c serving east London and south Essex with some of the L&BR's infrastructure used now by the Docklands Light Railway (DLR) such as viaducts and bridges with Tower Gateway being the renamed former Minories station, for example.

28. Mazawattee Tea Company 1864



Tea, synonymous with maritime trade, was introduced to Britain by the East India Company **(See 12.),** bringing 100lbs of China tea from Java in 1664. Demand brought a premium on the first of each year's crop, the 1850-60s' tea clippers and their races. Winning in 1866, the 'Taeping' sailed from Fouchow in China to London in 99 days. Its medicinal benefits led John Densham (1815-1886) to sell tea in his Plymouth chemist's shop. Moving to Croydon in the 1860s, he formed Lees and Densham, tea wholesalers in Philpot Lane, near the trade's Mincing Lane centre. John Densham & Sons followed in 1870 with offices at 49-51 Eastcheap and, after Guildhall research, a name in 1886 for their Ceylon blend, 'Mazawattee'. From the Hindi 'maza' or 'pleasure' and Sinhalese 'wattee' for 'garden', it became the world's largest tea brand in 1886. Its 1864 warehouse was in the Tower Hill Improvement Fund's mind on forming in 1933 to remove *'from it certain ugly buildings which at that time disfigured it and hampered its use.'* **(See 23., 24. & 43.)** Shown in 1932, the warehouse was bombed in 1940 but planning permission for rebuilding denied, the now Trust bought and demolished it in 1950. Only the Tower Hill Vaults, Grade II-listed, remain.

29. W. Young & Son 1890



The company that is now Young's Seafood Ltd and the UK's largest supplier of fish started in 1805 with Elizabeth Martha selling fish on the Greenwich quayside. In 1811, she married William Young whose family had fished the Thames since the mid-18th century. Company success brought a move downriver to Leigh-on-Sea and by the 19th century's close, the business comprised fish retailing and wholesaling while its own fleet of boats fished for whitebait and shrimps. With supplying the City in mind, the company headquarters moved in 1890 to Lovat Lane opposite Billingsgate Market **(See 4.)** but when this was relocated in 1982, W Young & Son left too. Constructed in 1985, the current building on the site carries this weather vane of a Bawley, a type of vessel used by Young's and others for whitebait fishing on the Thames until 1950.

More maritime weathervanes in the area are on Trinity House **(See 21.)**; St Katherine's Dock **(See 24.)**; Billingsgate Market **(See 4.)** and Lloyd's Registry **(See 32.)** which has two, while others in London are on such as Liberty's; St Lawrence Old Jewry; Two Temple Place; St Nicholas Cole Abbey; the Mission to Seamen and St Olave's, Rotherhithe.

30. 2-16 Creechurch Lane 1885



Some of the iron swinging hoists retained, this five-storey Grade II-listed building is thought to be iron-framed and was originally a tea warehouse. **(See 28.)**.

31. Tower Bridge 1894



Tower Bridge was designed by the City Corporation's Chief Architect, Sir Horace Jones and Sir John Wolfe Barry, the engineer, to meet the requirement for a river crossing downstream of London Bridge which still allowed access to the Upper Pool of London. Opened in 1894, construction took eight years and cost £1,184,000 (£128,563,471 in 2024). Typically, it is crossed daily by 40,000 motorists, cyclists and pedestrians. A combined bascule and suspension bridge, the largest in the world at the time, the upper walkway is 42m/138' above the Thames while the bascules open to 86° as shown. Originally, steam engines powered the hydraulic lifting system but were replaced by an electro-hydraulic system in 1976. Grade I-listed.

32. Lloyd's Registry 1901



The Society for the Registration of Shipping left Lloyd's Coffee House in Lombard Street **(See 15.)** in 1768 for No. 4 Sun Court, Cornhill. Providing merchants and underwriters **(See 42.)** standardised details of vessels' construction and equipment, it was the world's first marine classification society. With 215 Register Book subscribers, in 1797 it moved to No. 4 Castle Court, Birchin Lane. Updating then the classification system disadvantaged ships built outside London, prompting formation of the rival Society of Merchants, Shipowners and Underwriters which issued the 'New Register Book of Shipping' in 1799. Reconciliation came in 1834 with the inaugural meeting of the Committee of Lloyd's Register of British and Foreign Shipping. Reconstituted, Lloyd's Register opened for business at No. 2 White Lion Court, Cornhill. British shipping's growth and scrutiny needed of iron and steel steamship construction increased demand on the Register as the 19th century ended. New premises commissioned, the result was Thomas Collcutt's Grade II*-listed design at No. 71 Fenchurch Street. It is at the junction with Lloyd's Avenue, a former street of East India Company warehouses, remodelled and renamed by Collcutt and B Emmanuel in 1899. In 2000, the Richard Rogers Partnership-designed extension was opened.

33. Nos 15 & 14 Trinity Square 1909



On the corner of Byward Street and Trinity Square **(See 21, 22., 23., 24. & 38.)**, No. 15 was built in 1908-9 as the General Steam Navigation Company headquarters. Ships' prows appear at first floor level while the eagle sculpture above acknowledges the company's 'Eagle Steamers', famous for day cruises from Tower Pier, calling at Greenwich, to such as Southend, Clacton, Ramsgate or Margate. In the 1930s, 'Golden Eagle'; 'Crested Eagle' and 'Royal Eagle' were the best known of its paddle steamers. All three were amongst the 1,300 vessels, 23 being paddle steamers, that took part in the evacuation of 338,266 British and French troops from Dunkirk. The 'Crested Eagle' was attacked on 29th May 1940, some 300 troops and crew, half of its complement, being lost. **(See 38.)** Post-war, 'no passport' day trips to France, particularly with the 'Royal Sovereign', renewed the GSNC's prominence until such operations ceased in 1966, eclipsed by air travel. The ground floor is now a pub, the upper floors flats. Adjoining, No. 14 was built for the Swedish Chamber of Commerce in 1920-21.

34. Muscovy Street 1912



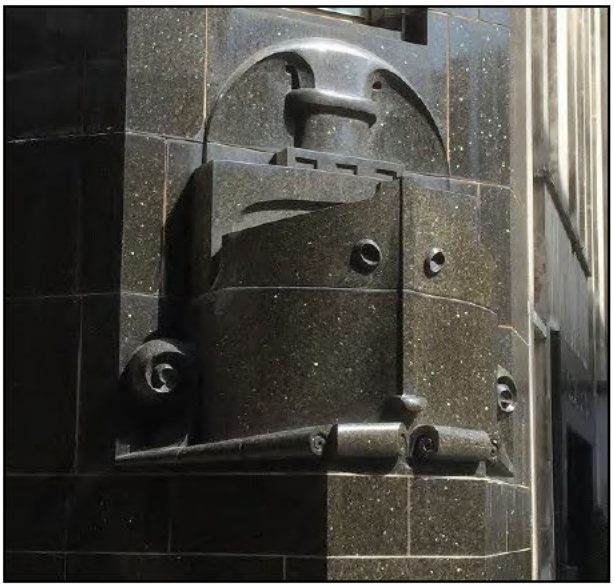
Muscovy Court was built after the 1673 fire destroyed the Navy Office and nearby buildings. The name came from the Muscovy Company formed in 1553 to find the northeast route to Cathay. Only one of its three ships reached Russia and the Czar, returning with his letter to Queen Mary granting privileges to English merchants. The Company receiving its charter in 1555, Muscovy House in Seething Lane became its base. Russian ambassadors and merchants visited as did Czar Peter the Great on his European tour in 1697-98. Wishing to modernise Russia, he spent four months at Deptford Dockyard studying shipbuilding. A pub at No. 48 Tower Street, now Great Tower Street, was renamed 'The Czar of Muscovy' in honour of his visits too. Construction of the PLA's headquarters **(See 38.)** allowed extension as Muscovy Street, linking Trinity Square and Seething Lane.

35. India Street 1913



Early 20th century redevelopment around Fenchurch Street involved some street renaming. George Street had housed warehouses of the East India Company **(See 12.)**, dissolved formally in 1874, and acquired this new name in 1913 to acknowledge that history. Rangoon Street stems from similar renaming while elsewhere in EC3, Bengal Court; Plantation Lane, Fish Street Hill and Sugar Quay Walk further reflect maritime trade with more examples being found beyond in the City and Tower Hamlets in particular.

36. Holland House 1916



Wm H Muller & Co, a Dutch shipping company, chose Hendrik Berlage to design its London offices in Bury Street. Known as the 'father of Modern architecture' in the Netherlands, the result is said to have been the first steel-framed building in Europe. Berlage is thought to have taken inspiration from the work of American architect Louis Sullivan on a visit to the USA in 1911. External walls of grey-green terracotta tiles, made in Delft and shipped in company vessels, top a black granite base. A merchant ship sculpted by the Dutch artist Joseph Mendes da Costa appears at the southeastern corner of the building which is Grade II*-listed. Construction of the office block, begun in 1914 and completed in 1916, was made possible during the First World War by the Netherlands' neutrality. **(See 37.)** Among many other shipping companies **(See 33.)** to have had an EC3 presence is Cunard. Opposite Holland House is Cunard Place which links Bury Street with Leadenhall Street where the former Cunard House was built at No. 88 in 1930.

37. Captain Charles Fryatt MM 1917



The Netherlands' neutrality in the First World War **(See 36.)** allowed North Sea ferry services to continue, albeit resented by Germany. Dutch operators' withdrawal then left only the Harwich-Rotterdam sailings by the Great Eastern Railway Steamship Company. One of its captains was Charles Fryatt of the Mercantile Marine. Several times from March 1915, German submarines ordered Fryatt to stop his unarmed ship but instead he made to ram the U-boats or outran them, outraging Germany. Around 0300 on 22nd June 1916, German naval vessels stopped Fryatt and the SS Brussels outbound to Harwich. The ship, 45 crew, including five stewardesses, and 100 refugee passengers were taken to Bruges and interned. On 27th July, two hours after a summary court martial, Fryatt, a civilian non-combatant, was shot by firing squad. On 7th July 1919, Fryatt's body was repatriated by Royal Navy destroyer, escorted by two more, to Dover and by train to Charing Cross. The purple-lined luggage van used had served previously for nurse Edith Cavell's coffin and in 1920 for that of the Unknown Warrior. On 8th, Fryatt's coffin was drawn by Royal Navy ratings on a gun carriage, a State funeral honour, to St Paul's for the service, hundreds of thousands lining the streets. The burial was in Dovercourt, Harwich, Fryatt's home. A hospital and pub there bear his name but reaction to his 'murder' finds it too in Belgium, the USA, South Africa, Mauritius, Australia and New Zealand. In the Canadian Rockies, Mount Fryatt is close to Brussels Peak, named after his ship, while this memorial is on Liverpool Street station.

38. Port of London Authority building 1922



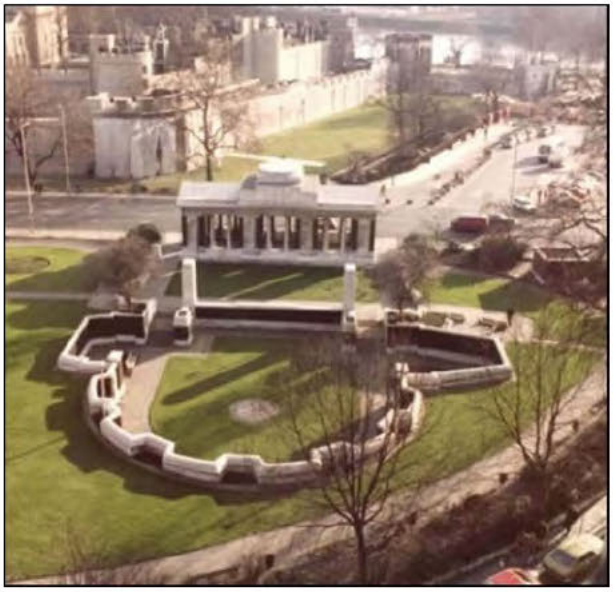
Designed by Sir Edwin Cooper in the Beaux Arts style, built by John Mowlem and Company and opened in 1922 by the Prime Minister, David Lloyd George, this was the headquarters of the Port of London Authority until 1970. At 53m/174', it was then one of London's tallest buildings and cost £909,000 (£52 million in 2020) Typically, it was visited daily by 1,200 shipping company staff paying port dues. Prior to unveiling the Merchant Navy Memorial in 1928 **(See 40.)**, HM Queen Mary visited too, walking across Trinity Square to the Memorial in Trinity Square Gardens **(See 22)**. In May 1940, Thames boatmen were summoned to the building to be asked to volunteer for a secret operation requiring them to be away for *'a few days'*. All did and were put into coaches for Tilbury to be told of 'Operation Dynamo' and their imminent part in the evacuation of British and French forces from Dunkirk by helping crew the 850 'Little Ships' involved **(See 33.)**. Later wartime bomb damage included the loss of the domed rotunda, its diameter greater than St Paul's dome, on 8th December 1940. In January 1946, the inaugural meeting of the United Nations General Assembly took place at the Methodist Central Hall in Westminster, delegates also attending a reception in the PLA building's boardroom. As the Four Seasons London at Ten Trinity Square, this Grade II*-listed building opened as a 5* hotel on 26th January 2017.

39. Pepys Street 1923



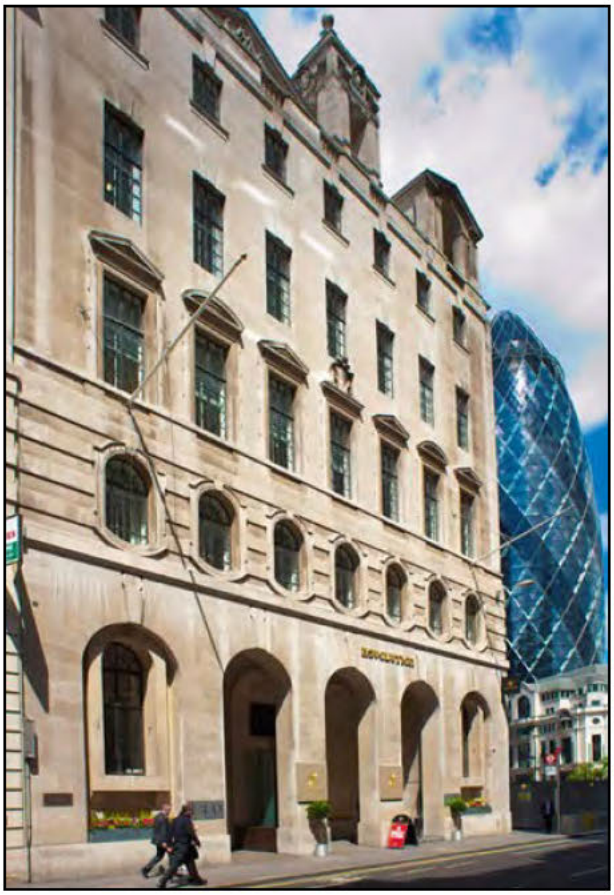
Building the Port of London Authority's headquarters in Trinity Square **(See 38.)** allowed Colchester Street to be extended, linking Cooper's Row and Seething Lane. It was renamed in 1923 in honour of Samuel Pepys who worked in the Navy Office **(See 13.)** in Seething Lane as Clerk of the Acts to the Navy Board 1660-73 and Surveyor-General of Victualling from 1665. As Secretary to the Admiralty 1673-79, **(See 5., 6. & 21.)** Pepys transferred to Whitehall to become Secretary for Admiralty Affairs 1684-89. He was also the MP for Castle Rising in 1673-8 and Harwich in 1679 and 1685-87.

40. The Merchant Navy Memorial 1928, 1955 and 2005



Sited alongside the Tower Hill Memorial **(See 8.)** in Trinity Square Gardens **(See 22., 23. & 24.)**, the Merchant Navy Memorial bears more names than any other Commonwealth War Graves Commission memorial in the UK. The 36,551 commemorated, all with no grave but the sea, are merchant seafarers, fishermen and members of the lighthouse and pilotage authorities. Men and women, civilians all, their ages range from 13 to 74. The First World War section was unveiled in 1928 by HM Queen Mary, designed by Sir Edwin Lutyens and is Grade I-listed, its names representing at least 103 nationalities. Two named, Captains Frederick Parslow and Archibald Smith, are the only civilians awarded the Victoria Cross in the War. Grade II*-listed, the Second World War section, its bronze panels enclosed by a low wall, was designed by Sir Edward Maufe with sculpture by Sir Charles Wheeler and unveiled by HM The Queen in 1955. A Falklands Campaign section was unveiled by the First Sea Lord in 2005. Merchant Navy Day and Remembrance Day services are held at the Memorial annually in September and November.

41. Nortraship 1940



Following the German invasion of Norway on 9th April 1940, Nortraship was formed to administer the Norwegian merchant fleet, 85% of which remained outside areas under German control. To maintain Norway's neutrality, this fleet of some 1,000 ships and 30,000 seamen was chartered to the British Ministry of Shipping. Norway had the fourth-largest merchant fleet in the world after the UK, USA and Japan. Around 42% of the fleet comprised modern tankers, a total of 18% of the world tanker tonnage and of crucial importance to Britain. Nortraship established its London office at 144 Leadenhall Street on 19th April 1940. By that October it had 230 staff, increasing to 350 a year later; one-third were Norwegians. At the same time, its New York office had more than 200 personnel, most Norwegian. Nortraship had become the world's largest shipping company. 3,670 Norwegian merchant seamen and 977 foreign crewmen, many British, serving with Nortraship were lost to enemy action together with 706 ships. A plaque on the left of the building's facade states:-

'From 1940 to 1945 this building housed NORTRASHIP - The Norwegian Shipping and Trade Mission - established by the Norwegian Government in exile and Norwegian shipowners. NORTRASHIP operated the merchant fleet of more than 1000 ships which made a vital contribution to the Allied victory in World War II.'

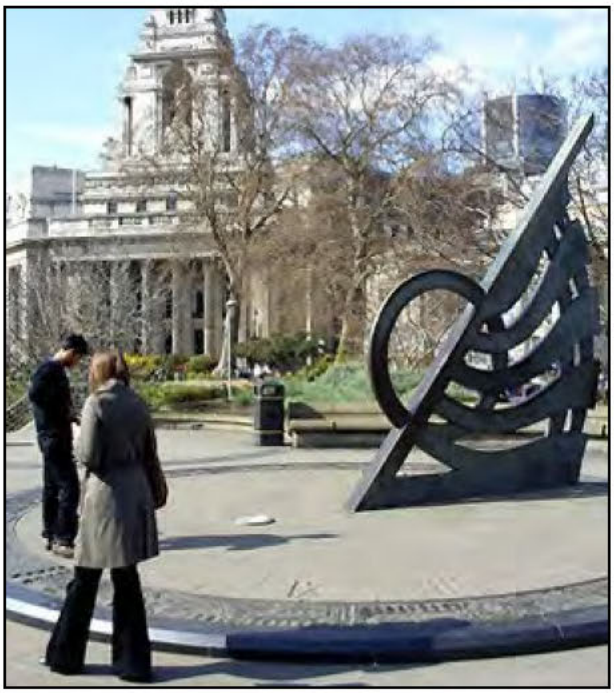
Grade II-listed, this Lutyens design was built in 1929.

42. Lloyd's Building 1986



Like the Society for the Registry of Shipping **(See 32.)** in 1768, dismayed by the declining standard of the patrons, the merchants, insurance underwriters and brokers left Lloyd's Coffee House **(See 15.)** at No.16 Lombard Street in 1769 to open the 'New Lloyd's Coffee House' at No. 5 Pope's Head Lane and issue the first edition of the 'New Lloyd's List', its shipping news and intelligence bulletin. The underwriters next formed their own association, the Society of Lloyd's, transferring to the Royal Exchange in 1774. This was destroyed by fire in 1838 so Lloyd's moved to South Sea House in Threadneedle Street, returning to the rebuilt Royal Exchange in 1844. The next move came in 1928 to No. 12 Leadenhall Street, the first building Lloyd's had ever owned; it was designed by Sir Edward Cooper. Continued expansion led to acquiring adjacent Royal Mail House, another Cooper design, in 1936. Expansion brought a move in 1958 to a further new building, No. 51 Lime Street, the work of Terence Heysham. Even three buildings proved inadequate so Lloyd's opened a design competition in 1978. Required was the ability to expand or contract the building's space and facilities in response to market fluctuations. The winning design by the Richard Rogers Partnership puts the services on the structure's exterior to maximise internal space and flexibility. Opened in May 1986, it was built on the No. 1 Lime Street site of the Cooper building, which in turn had been that of the East India Company's headquarters **(See 12. & 28.)**. In 2011, the building became the youngest to receive Grade I-listing. While marine insurance remains important, Lloyd's involvement in other fields too make it one of the leading insurance markets in the world. Similarly, having dropped the 'New' prefix in 1789, 'Lloyd's List' is now amongst the world's longest continually-published journals and has been digital since 2013.

43. Wakefield Gardens 1992



Land immediately south of Tower Hill Underground station was donated as public open space by the Wakefield Trust **(See 23., 24. & 28.)** in the 1930s for the benefit of local people. Opened in its present form as Wakefield Gardens in 1992, it is dominated by a 6m/20′ dimeter sundial commissioned by London Underground Ltd. Designed by John Chitty, Edwin Russell produced the bronze relief panels, which depict the story of London from the arrival of the Romans in 43AD through such as the Black Death 1348-49; Gunpowder Plot 1605; English Civil War 1642-51; Great Fire 1666; first police force 1829; Battle of Britain 1940; Blitz 1940-1941 and Festival of Britain 1951 to the Thames Barrier of 1982.

The delineation for the sundial's design, the mathematical and astronomical computations required, was the work of Captain Christopher Daniel, Master of the HCMM 1989-90.

44. Baltic Exchange 1995



The date of 1995 belies the Baltic Exchange's prior 221 years of history, the organisation having moved to No 38 St Mary Axe after the IRA bomb attack of 10th April 1992 on Nos 24-28 St Mary Axe, its Grade II-listed headquarters. Three were killed and 91 injured by the explosion which also caused £800 million worth of damage (£1.7 billion in 2024). The Baltic Exchange began however with the 'Virginia and Maryland Coffee House' at No 61 Threadneedle Street being renamed as the 'Virginia and Baltick Coffee-House' in May 1744, as frequented by such traders. Napoleonic War demands and tallow market speculation led in 1823 to codifying its trading practices and membership rules, leading to today's Baltic Code of Conduct. Expansion brought an 1825 move to No 58 Threadneedle Street when known as 'The Baltic Coffee House'. More expansion meant moving in 1857 to No 37 Threadneedle Street, 'South Sea House' **(See 42.)**. Members dealt in hides, tallow, oil, indigo, tar and grain but included shipowners and agents. The advent of steam-ships also increased trade, the London Shipping Exchange being formed in 1891 by shipowners and operators. Merged, The Baltic Mercantile & Shipping Exchange Ltd followed in 1900 and Nos 24-28 St Mary Axe was opened in 1903. More than 3,000 members currently handle much of the world's markets in dry bulk, tanker, gas and container shipping as well as charter, sale and purchase. With offices from Houston to Shanghai, the Baltic Exchange is the world's only independent source of maritime market information for the trading and settling of physical and derivative contracts. Grade II-listed, the building, once No 40, is a 1922 design by Sir Edwin Cooper.

45. Malta GC Memorial 2005



That Malta underwent the heaviest, sustained bombing in the Second World War, 6,700 tons being dropped during 154 days and nights, is indicative of its strategic rôle. In April 1942 King George VI awarded Malta the George Cross, the highest civilian decoration, to *'bear witness to the heroism and devotion that will long be famous in history'*. Little food and aviation fuel remained in mid-1942 when the Allies mounted 'Operation Pedestal', a convoy by way of a final attempt to save Malta: 7,000 civilian and military personnel were killed in the siege. The convoy's escort of 45 Royal Navy warships included four aircraft carriers. After five days of continuous attack, four cargo vessels and the tanker SS Ohio, sole survivors of the original 14 merchant ships, entered Grand Harbour on 15th August 1942, the feast of Santa Maria. George Crosses was awarded to three convoy members: Captain Dudley Mason of the Ohio; Apprentice John Gregson of the MV Deucalion and PO Cook Charles Walker, HMS Ledbury. A Distinguished Service Order; four Distinguished Service Crosses and seven Distinguished Service Medals also were awarded. Breaking the island's Axis siege allowed North Africa and then Sicily to be retaken, leading to the liberation of Italy and beyond. Located outside the western end of All Hallows by the Tower **(See 3.)**, the Memorial's limestone is from Gozo in the Maltese archipelago. A service of commemoration takes place annually in August at the Memorial.

6. CONCLUSION

6.1 The Destination City website recommends the City Visitor Trail, *'a 90 minute self-guided tour'*. It then offers the following Trail themes: Law and literature; London stories, London people; Culture vultures; Skyscrapers and sculpture and City Children's Trail. The City, indeed so much of the UK, was built on maritime trade of which evidence, past and present, is to be found across the City. Overlooking this for the Visitor Trail is not simply a significant omission but it suggests other themes also have been ignored. What of different periods of history in the City, not least the Roman? Street names similarly are a subject of interest as is architecture, for example. That Destination City was not launched until May 2022 adds to a concern that the Corporation's championing of heritage is not just recent but somewhat superficial if not cosmetic. Its encomium for 'The Tulip' is not forgotten nor is it that the application for No. 31 Bury Street effectively has been resubmitted. What does the Corporation really mean by '*unrivalled*' heritage?

6.2 The Honourable Company of Master Mariners wishes respectfully to request that both of these applications are refused by the City of London Corporation.

END

To: City of London Planning Department

P.O. Box 270, Guildhall, London, EC2P 2EJ.

Email: anna.tastsoglou@cityoflondon.gov.uk

Dear Anna,

Re: Planning Application Reference: 24/00021/FULEIA.

1. I write to object in the strongest terms to the application for the proposed redevelopment of 31 Bury Street ("the Scheme"). The construction of a 45-storey tower on this site will cause unacceptable harm to the neighbouring Grade I listed Bevis Marks Synagogue.

2. I visit and worship at Bevis Marks Synagogue throughout the year and was married at the Synagogue. I have over 15 years' experience as a planning barrister and make these representations in a personal capacity.

3. This is at the least the fourth occasion on which I have made representations to the City in respect of planning applications for office developments adjacent to the Synagogue and which have each threatened the setting and future use of the historic Synagogue. Three years ago, I addressed the City of London's planning committee when the same developer proposed a very similar development on the same site. On that occasion, members of the planning committee commendably refused a very similar scheme. It is regrettable that we are back again.

4. The developer is seeking to get its way by a process of attrition. The Synagogue is a small religious institution which has had to incur significant cost and devote significant time in fighting these planning battles, resources which have had to be diverted from serving the Jewish and wider community who use and visit the Synagogue. That is unacceptable.

5. I make four main points in opposition to the Scheme:

6. **First, the Scheme is in direct conflict with the statutory development plan.** The application site is within the recently created Creechurch Conservation Area. Local Plan Policy CS14 provides that planning permission for tall buildings should be refused within inappropriate areas, comprising conservation areas. The Scheme is for a very tall building in the conservation area – it should thus be refused alone. Parliament requires development to be plan led - see s.38(6) of the Planning and Compulsory Purchase Act 2004). The purported "benefits" of what is an ordinary office redevelopment do not outweigh the fundamental conflict with the development plan.

7. **Second**, **the Scheme results in significant harm to the setting of the Grade I listed Synagogue and to the wider Creechurch Conservation Area.** The large office tower would loom over the Synagogue, deprive it of light, destroy its southern sky view and with it the sunlight and daylight received by the Synagogue's courtyard, which is vital for communal and religious ritual undermining those uses.

8. Sections 66 and 72 of Planning (Listed Buildings and Conservation Areas) Act 1990 require the City to pay "special regard" to the desirability of preserving the Synagogue and its setting and to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. The importance of these statutory duties was underlined by the Court of Appeal in *East Northamptonshire DC & Barnwell Manor Wind Energy Ltd v Secretary of State* [2015] 1 WLR 45. The duties apply with particular force given that the Synagogue is a Grade I (a status enjoyed by only the elite 2.5% of listed buildings).

9. In the emerging City Plan 2040, Policy HE1 paragraph 8 provides that *"development in the defined immediate setting of Bevis Marks… should preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets".* There are two points to make in this regard. First, the draft plan should be given very limited weight. Second, Policy HE1 appears to attempt to cut down the protection afforded to the Synagogue by the Creechurch Conservation Area whose boundaries include the development site. The intention of the authors of the draft plan is not entirely clear but in so far as their aim is to limit the protection of the Synagogue just to its courtyard or perhaps even less – such an attempt is impermissible. The term "immediate setting" is not recognised by conservation and planning law. Sections 66 and 72 of Planning (Listed Buildings and Conservation Areas) Act 1990 refer to the "setting". The setting is the setting – it includes views in and views out of the Synagogue and the Conservation Area.

10. A building's setting includes the nature, scale and siting of the development proposed, its proximity and likely visual relationship to the listed building, the architectural and historic characteristics of the listed building itself (see *R (Williams) v Powys County Council* [2018] 1 WLR 439 at [53]). In this case, the overshadowing and the overbearing presence of the adjacent proposed tower which would dwarf the Synagogue, the removal of the sunlight and daylight to the Synagogue courtyard and natural light to Synagogue's interior result in harm which must be given great weight.

11. The proposed building would also damage the setting of other heritage assets in the local area and would compromise the qualities of the Conservation Area as a whole. The Scheme's harm to the setting of Synagogue and the Conservation Area coupled with the conflict with the development plan is not outweighed by the public benefits of the Scheme.

12. The developers contend the Scheme provides planning benefits which outweigh the harm to the synagogue. However, what they propose is merely what is required by policy. For example - car free, demonstrating holistic environmental design, having consolidated deliveries – are features that would be expected in any modern commercial building, and they do not represent a public benefit.

13. **<u>Third,</u> the City must show consistency in its decision making. Having refused a very similar scheme three years ago, the City should refuse this latest Scheme.** The principle and desirability of consistency in planning decision-making is well

established. This matters in order to retain confidence in the development control process (see *North Wiltshire District Council v Secretary of State for the Environment* [1993] 65 P & CR 137, at 145).

14. The City rejected a very similar scheme at 31 Bury Street only three years ago. The new Scheme makes only a modest reduction in height to 45 storeys and has a larger footprint than the previous scheme which was rejected.

15. Moreover, since the previous Bury Street application was refused and, as discussed above, the City has adopted the Creechurch Conservation Area. That decision, supported by the Conservation Area Appraisal, reflected the uniqueness of Bevis Marks and purported to protect the Synagogue and its local setting. The City specifically decided that the boundary of the conservation area should include the Bury Street site and recognised the importance of the Synagogue's wider setting.

16. To approve this Scheme, in conflict with the local development plan and these previous decisions would be inconsistent and undermine confidence in the planning process.

17. **<u>Fourthly,</u> the City must have regard, in accordance with its Public Sector Equality Duty, to the disproportionate negative impact this Scheme will have on 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.**

18. 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 Synagogue is the only protected non-Christian place of worship within the City. This Scheme would harm the Synagogue's setting and the conduct of religious and communal ritual at the Synagogue.

19. There has been 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 latest Scheme and previous commercial office planning applications at 31 Bury Street and Creechurch Lane which were refused or withdrawn. In that context, refusing this latest application which has comparable impacts to those earlier applications represents an 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.

20. The City has come a long way in recent years in its understanding of Bevis Marks Synagogue and its unique role in British Jewish life. Approving this planning application would represent a huge error and reverse that progress. The Jewish community has been forced to fight these repeated planning battles through no fault

of its own. If the City wishes to uphold its legal duties and stand by its Jewish community it will reject the proposal.

Yours sincerely,

Sarah Sackman

From: [redacted]
[redacted] Planning Policy Consultations
Subject: Local Plan representation
Date: 31 May 2024 17:55:22

THIS IS AN EXTERNAL EMAIL

Although my wife and I live in Oxford, we are members of Bevis Marks Congregation.

I am concerned that the draft City Plan 2040 does not protect the close neighbourhood of Bevis Marks Synagogue, despite the recent rejection of a proposal for the construction of a tall building on a site very near to the Synagogue (31 Bury Steet).

A particular problem arises from the fact that there appears to be no presumption in the new Plan against tall buildings in Conservation Areas. Thus a new proposal for a tall building at 31 Bury Street would not be blocked automatically, as it should be given the crucial importance of the sky view from the Synagogue.

I hope the plan will be revised so as to strengthen the protection given to heritage sites within the City, and in particular to make clear that the Tall Buildings Area will never override the importance of heritage.

Michael Yudkin
12 Lonsdale Road,
Oxford OX2 7EW.

From: Jonathan Ben Garcia
To: PLN - Comments
Subject: Re: Objection to Planning Applications 24/00021/FULEIA & 24/00011/LBC
Date: 11 November 2024 11:36:35

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou

I am writing to object to the re-consultation for planning application 24/00021/FULEIA for the proposed tower block at 31 Bury Street.

As I wrote in my previous objection to this application:

- Last year the Creechurch Conservation Area (CCA) was implemented. In the consultation prior to the CCA, there were several different options. One excluded 31 Bury Street from the CCA, another included 31 Bury Street in the CCA. The City agreed to the inclusion of 31 Bury Street in the CCA. Given that the options were clearly presented and a firm decision was reached, **this application should have been rejected before it even arrived at the consultation stage**.

Please also see my other concerns as highlighted in my objections to 20/00848/FULEIA for the proposed tower block at 31 Bury Street and 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane in my emails below from November and December 2020.

Best regards
Jonathan

Jonathan Ben Garcia
11 Templars Ave, London NW11 0PB

On Mon, 22 Apr 2024 at 17:01, Jonathan Ben Garcia [redacted] wrote:

> Dear Ms Tastsoglou
>
> I am writing to object to the new planning application 24/00021/FULEIA for the proposed tower block at 31 Bury Street. Several of these points are the same as previous applications 20/00848/FULEIA for the proposed tower block at 31 Bury Street and 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane (see emails below from November and December 2020).
>
> To supplement my previous objection, I have the following additional comments:
>
> - Last year the Creechurch Conservation Area (CCA) was implemented. In the consultation prior to the CCA, there were several different options. One excluded 31 Bury Street from the CCA, another included 31 Bury Street in the CCA. The City agreed to the inclusion of 31 Bury Street in the CCA. Given that the options were clearly presented and a firm decision was reached, **this application should have been rejected before it even arrived at the consultation stage**.
>
> Best regards
> Jonathan
>
> **Jonathan Ben Garcia**

11 Templars Ave, London NW11 0PB

On Thu, 24 Dec 2020 at 16:24, Jonathan Ben Garcia [redacted] wrote:

> Dear Mr Richards
>
> I am writing to object to the new planning application 20/00848/FULEIA for the proposed tower block at 31 Bury Street. Several of these points are the same as the planning application 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane (see email below from 21 Nov).
>
> To supplement my previous objection, I have the following additional comments:
>
> - As well as it being forbidden to use a microphone, there are also several sections of the service that involve silent meditation. Increased noise from pedestrian traffic and cyclists would interrupt these moments of silent meditation.
> - Rabbi Morris has also released a new video regarding the impact of the proposed tower block on the Synagogue's lighting: https://youtu.be/196tIIzTb2w. As Bevis Marks Synagogue is Grade 1 listed, it's environment should be preserved including the natural light on the eastern side and to it's courtyard.
> - As well as being used for religious worship, "civil services have been held at Bevis Marks for many occasionsincluding the 50th anniversary of the Council of Christians and Jews, the 50th Anniversary of VE Day and the first visit to Britain of a president of Israel ... (in 1984 for the bicentenary of the birth of Sir Moses Montefiore and in 1965 for the death of Sir Winston Churchill." see https://www.sephardi.org.uk/bevis-marks/history-design/. The building works and subsequent tower blocks will impact on such future events.
>
> Best regards
>
> **Jonathan Ben Garcia**
>
> Flat 6, Heathway Court
> Finchley Road
> LONDON NW3 7TS
>
> On Sat, 21 Nov 2020 at 21:52, Jonathan Ben Garcia [redacted]> wrote:
>
> > Dear Mr Richards
> >
> > I am writing to object to planning application 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane for the following reasons:
> >
> > - Building works for the proposed tower block would impact on the ability of the community of Bevis Marks Synagogue to hold regular services and host weddings. On the Jewish Sabbath and Holy Days, it is forbidden to use a microphone, so it would be impossible to compete with the noise from the building site. It is also important that the synagogue be able to retain its step-free access from the entrance on Heneage Lane.
> > - The proposed tower block would significantly reduce the synagogue's lighting, by blocking natural light on the eastern side. Rabbi Morris has several videos dedicated to Bevis Marks' architecture

(www.youtube.com/channel/UCXBehglz-MVe4TpLDGCNcbg) and how these could be impacted by the proposed tower block. I would commend these to the planning committee when they come to their decision.

- Bevis Marks Synagogue is one of three Grade 1 listed Synagogues in the UK. It has been open for worship every year since 1701. For the Jews of the Spanish and Portuguese Congregation, the Synagogue surviving the Blitz is as much of a miracle as its Christian fellow, St Pauls, which was constructed at the same time.
- On a personal note, Bevis Marks Synagogue is very close to my heart. As a child, we would regularly attend the Synagogue on Sundays for its daily morning service. As a treble chorister, I was invited to sing in the 300th anniversary of the Synagogue. I wrote a project about the Synagogue of the Square Mile when I was eight, which I presented to my class at school (I have attached a copy). More recently, my wife and I were married in the Synagogue.

Best regards

Jonathan Ben Garcia

Flat 6, Heathway Court
Finchley Road
LONDON NW3 7TS

St Helen's Bishopsgate

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Anna Tastsoglou
Department of the Built Environment
City of London Corporation
PO Box 270 Guildhall London
EC2P 2EJ

Dear Ms Tastsoglou
Re: 24/00021/FULEIA, Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

I write to acknowledge the proposed development at Bury House 1 - 4, 31 - 34 Bury Street, London EC3A 5AR and to provide comments on behalf of the churches of St Helen's Bishopsgate and St Andrew Undershaft.

Throughout the planning stages, we have been pleased with the constructive engagement demonstrated by BentallGreenOak. They have made an admirable effort to keep us informed of their plans, as well as addressing our concerns so far and we have appreciated their inclusive approach. In fact, the developers have kindly, on occasion, shared some of the space within the existing buildings, allowing us to continue running our ministries when our own space has been constrained.

Given the development's location, we do not foresee any direct impact on the churches' day-to-day functions, their structure or, most importantly, the running of their ministry. Based on our current understanding, the project appears to be situated far enough from our premises to avoid significant disruption.

As such, we wish to express, on record, that we currently do not have any objection to the proposed plans, while continuing to reserve the rights of the churches forthwith. We trust that the City of London will carefully evaluate all aspects of the proposed development in the best interest of the community.

Thank you for considering our input.

Sincerely,

[redacted]

Paul Conolly
Development Liaison Manager
St Helen's Bishopsgate

CHARITY NAME
The Parochial Church Council of the Ecclesiastical Parish of St Helen, Bishopsgate

REGISTERED CHARITY NO. 1131501

City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

11th November 2024

Dear Sir/Madam,

At its meeting on 31st October 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.127 24/00021/FULEIA - Bury House, 1 - 4, 31 - 34 Bury Street, London EC3A 5AR
Creechurch Conservation Area/Aldgate Conservation Area. No Ward Club Rep.
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/cafe (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

The Committee confirmed that it strongly objected considering that the development proposals would result in the gross overdevelopment of this site in the Creechurch Lane Conservation Area, with a significantly negative impact on the character and appearance of the immediate Conservation Area and its setting. The proposals were considered to be highly damaging to the local townscape quality in the nearby street-scene context, with harmful consequences for important listed buildings that were in close proximity. The lack of architectural quality and refinement of the proposals was noted, together with their significant negative impact on wider townscape views and heritage context of the site's City/central London location.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

[redacted]

Mrs. Julie Fox
Secretary

Objections to proposals for a 43-storey tower at 31 Bury Street

Ref.24/00021/FULEIA

For some thirteen years until my retirement in 2017 I was a judge at the Central Criminal Court. I came to know and value the City and its buildings pretty well. In particular, I appreciate and value Bevis Marks Synagogue, a Grade 1 listed building in the Creechurch Conservation Area. I occasionally attend services there. I was and still am struck in the late afternoon by the gradual and moving change from natural lighting to candlelight.

For some years now I have attended the synagogue for the annual eve of the Day for Atonement service (Kal Nidrei) when that metamorphosis from daylight to candlelight is part of the religious experience.

I am also a Past Master of the Worshipful Company of Bakers. In my year as Master (2017-2018) the Company held its Election Service at the synagogue. It was an extremely affecting service. Members of the Company, both Jewish and non-Jewish, said at the time and for many months afterwards how moving they found the whole experience,

Accordingly, not only do I object to the proposals on the basis that the tower would completely overwhelm the synagogue and in doing so would overshadow both the building itself and the courtyard for much of the day thereby destroying the religious experience of which I have spoken above but also because of the potential damage it would cause to a world famous historic building.

Furthermore, it seems to me that the proposed development is in the wrong location not just for the reasons I have enumerated above but also because I question the need for yet another high rise edifice in the City when there is so much unused office space already with the Square Mile.

The existing building is only forty years old and it seems to me is capable, with sensible refurbishment if so desired, of providing for the needs of the developer for a good many years to come.

Finally, this is not the first time that this application has been made. It is not much different to the original one which was refused. The divergences are, in my opinion not enough to make the decision any different this time.

For the reasons I have set out above I object to the proposals.

HH Stephen Kramer KC
20th November 2024

IN RESPECT OF

BEVIS MARKS SYNAGOGUE

Advice on Equalities Statement for the proposed redevelopment of Bury House

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Introduction

1. In instructions dated 17 October 2024, I was asked by Roger Hepher of hgh Consulting, on behalf of the S&P Sephardi Community at Bevis Marks Synagogue ("**BMS**"), to advise on the Equalities Statement accompanying the live planning application for the proposed redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR (ref. 24/00021/FULEIA) ("**the planning application**"). The purpose of the Equalities Statement is to assist the City of London in discharging its legal duties to consider the equality impacts of the planning application in its role as the planning authority.

2. The planning application and related application for listed building consent were submitted to the City of London in January 2024. The proposed development comprises the demolition of Bury House and construction of a 43-storey tower, the partial demolition of Holland House and Renown House and extensions to both buildings, for office, flexible retail/café and flexible community/education/cultural/amenity uses.

3. I was specifically asked to advise on whether the Equalities Statement is sufficiently detailed on the potential impacts of the planning application on the Jewish community at BMS to discharge the legal requirement for decision makers to have due regard to equality considerations throughout the decision-making process.

4. My advice will first address the factual background, including the circumstances of BMS. I will then set out the legal framework and relevant caselaw governing the assessment of equalities impacts under the *Equality Act 2010* ("**EqA 2010**") followed by my views on whether the Equalities Statement is sufficiently detailed.

5. This advice is my independent and impartial view of the application of the law to the facts of this case. If the S&P Sephardi Community at BMS decides to waive legal advice privilege and put this advice in the public domain, I kindly request that it avoid selective quotation, which may be taken out of context. If the advice is made public, I will not assume liability for any reliance by third parties.

Factual Background

BMS and the Jewish Community

6. BMS dates back to 1701 and is the oldest and most historically significant synagogue in the country, often referred to as the 'Cathedral' Synagogue due to its significance within the Jewish faith. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance and its importance both within the City of London and on a national level is recognised by its Grade I Listed status. This is the highest level of listing, meaning the building is deemed, on a national level, to be of 'outstanding' special architectural and historic interest. Indeed, the Historic England Grade 1 listing notes that the Synagogue's "*little altered state is of exceptional historic interest.*"

7. The Synagogue stands within a courtyard which functions as part of the Synagogue and is of great value to the community as a social and religious space, for gathering before and after services and for holding events. My instructions and supporting documents explain that the unobstructed night sky view from the courtyard serves an important spiritual and ritualistic purpose that is central to Jewish practice.

8. The weekly celebration of the Sabbath does not officially end until the average person can see three medium sized stars in the sky; a ritual that is consciously observed from the courtyard of BMS every week. Members of the congregation at BMS further rely on the appearance of three medium sized stars in the sky to fulfil their daily obligation of reciting the *Shema Yisrael* every evening. Although the congregation may rely on the clock when it is too cloudy to observe the appearance of the three stars, the centuries old practice of observing them from the courtyard is of fundamental importance to religious practice at BMS.

9. Similarly, the beginning of each new Jewish (lunar) month is marked by the appearance of the new moon. Each month, approximately one week after seeing the new moon, the BMS congregation gathers outside in the courtyard to recite a special blessing over the new moon. The permanent obstruction of the night sky view from nearby development would render it impossible to perform the prayers because the moon would no longer be visible from the courtyard for significant periods of time. A key ritual observed at this site for hundreds of years would therefore be permanently lost to the Synagogue community.

10. The sky view is also critical to ensuring that enough daylight reaches the interior of the Synagogue. Adequate natural light is key to religious worship at BMS given the intrinsic nature of reading a large quantity of printed texts to Jewish worship. Adequate light levels must be maintained within the Synagogue for this to continue. The amount of natural light in the Synagogue has already been reduced by the construction of higher buildings in the surrounding area and its status as a listed building greatly restricts the possibility of installing further electrical lighting. I understand from my instructions that any further reduction in natural light would jeopardise the ability of the congregation to read from the printed texts.

11. Furthermore, ample light is crucial to safely carrying out circumcisions at the Synagogue; a practice that has continued uninterrupted at BMS for over three hundred years. My instructions explain that those who conduct circumcisions at BMS have raised concerns that any further reduction to light levels would render it impossible to carry out circumcisions at BMS.

Previous planning decisions

12. In October 2021, the City of London's Planning and Transport Committee refused a previous, similar application by the same applicant (an application for a 48-floor tower at 31 Bury St). The refusal identified two harms. The first was harm to the setting and amenities of Grade-1 listed Bevis Marks Synagogue by reason of the "*overbearing and overshadowing impact of the development on the courtyard of the Synagogue*." The second was harm to the World Heritage Site Tower of London.

13. The main difference between the new planning application and the application that was refused in October 2021 is a reduction in height of 19m and two high-level setbacks. BMS considers these modifications to be of little consequence given that the proposed development would be 178.7m high in any event. However, the newly designated Creechurch Conservation Area, within which BMS and the proposed development site at Bury Street sit since its formal designation in January 2024, is a key difference.

14. In November 2021, the Secretary of State refused permission for the 'Tulip' skyscraper in the City of London. BMS was amongst the heritage assets considered in the decision, with the Secretary of State finding that the setting of BMS is "*largely limited to what can be experienced from within its courtyard*" and the "*wider setting*" of the Synagogue "*includes a number of office towers, visible from the courtyard*." Regarding BMS and a number of other heritage assets, the Secretary of State remarked that the Tulip would "*cause a marked exacerbation in the existing harm from tall buildings to the setting of the assets and the ability to appreciate their architectural or historic significance. The effect would be variously to create an overbearing presence from within the curtilage of the heritage asset (…)*" (in relation to BMS).

The City Plan 2040

15. The City Plan, which was submitted for examination on 29 August 2024, sets out the City Corporation's vision, strategic objectives and planning framework to guide future development and decision-making in the City of London to the year 2040. Inspectors have been appointed to carry out the examination but the dates for examination have not yet been published.

16. The City Plan proposes to include the Synagogue within the Tall Buildings Area and remove the current presumption against tall buildings in the Conservation Area. It further proposes to protect only the "immediate setting" of the Synagogue. Weight is of course a matter for the decision-maker. However, given the draft City Plan is still in the relatively early stages of the decision-making process, it should be given no more than limited weight by the Committee when it comes to decide the planning application.

BMS' objection to the planning application

17. In May 2024, BMS submitted a detailed, 33-page objection to the planning application describing the interrelationship between the Synagogue's heritage and religious significance. The main objections included in this letter can be summarised as follows:

    (i) The proposed development would cause substantial harm in heritage terms to the significance of BMS and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

    (ii) The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

    (iii) The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

    (iv) The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Legal Framework

Primary Legislation

18. Section 149 of the EqA 2010 (which is referred to as the 'general equality duty') provides that:

    (1) A public authority must, in the exercise of its functions, have due regard to the need to—
    (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(…)

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(…)

(7) The relevant protected characteristics are—

- *age;*
- *disability;*
- *gender reassignment;*
- *pregnancy and maternity;*
- *race;*
- *religion or belief;*
- *sex;*
- *sexual orientation.*

19. It will be apparent from the above that having "*due regard*" to equalities impacts imposes positive obligations on decision makers to "***advance** equality of opportunity*", "***foster** good relations*", "***remove or minimise** disadvantages*" and "***take steps***" to meet the needs of persons who share a protected characteristic [emphasis added]. It therefore follows that the starting point for decision makers subject to the PSED is to robustly consider the *positive steps* they can take to meet the needs of persons who share protected characteristics, remove or minimise disadvantages etc. It will not be sufficient for the purposes of s.149 to accept harm as a foregone conclusion and then merely

decide on the level of harm that will be acceptable to those sharing a relevant protected characteristic.

Guidance

20. The Equality and Human Rights Commission's 'Technical Guidance on the Public Sector Equality Duty: England' (updated in April 2023) explains at para 2.17 that the public sector equality duty ("**PSED**") "*applies to individual decisions as well as policy formulation (...)*" although "*this does not mean that what the duty requires those exercising the function to do in both these situations is the same. The courts have made it clear that the regard due when exercising a function will depend on the circumstances in which a function is being exercised.*"

21. The Guidance clarifies at para 2.39-2.40 that to 'have due regard' means "*that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the general equality duty (...) How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general duty to the decision or function in question. The greater the relevant and potential impact, the higher the regard required by the duty*."

22. As to how the different needs of people with protected characteristics might be met when those needs differ from those without them, the Guidance clarifies that the duty is to meet 'needs' rather than any desires or preferences. The need must be intrinsic to the protected characteristic. In the context of the protected characteristic of religion or belief, the Guidance clarifies at para 3.30 that a relevant body "*may have to have regard to meeting needs which arise as a consequence of religious belief, where these arise in the context of a function which they do have*."

23. Complying with the general equality duty in practice entails ensuring a sound evidence base because in order to give proper consideration to the aims set out in the general duty, the relevant decision-making body will need to have sufficient evidence of the impact its policies and practice are having or are likely to have on people with protected characteristics (The Guidance at para 5.15). This entails sufficient understanding of the disadvantages or different needs of people who share a particular protected characteristic.

24. Importantly, it will be necessary to collate relevant information to have evidence-based decision-making and a body subject to the PSED will need to be able to show that it had adequate evidence to enable it to have due regard to its s.149 duty. Para 5.17 of the Guidance states that "*adequate and accurate equality evidence, properly understood and analysed, is at the root of effective compliance with the general equality duty. Without it, a body subject to the duty would be unlikely to be able to have due regard to its aims*."

25. A proper evidence base allows a body to understand the effect of its policies, practices and decisions, to consider whether further research or engagement is necessary, to consider whether there are ways of mitigating any adverse impact identified and decide whether to modify or reconsider a policy, practice or decision (para 5.18 of the Guidance). A relevant body cannot hide behind a lack of evidence or information about a relevant issue to justify not being able to meet the PSED. If the body does not have sufficient evidence to have due regard under s.149, it will need to obtain it (para 5.23 of the Guidance).

Case Law

26. The above principles set out in the Guidance are derived from case law. The seminal cases on the general equality duty are summarised below.

27. In *Hotak v Southwark LBC* [2015] UKSC 30; [2016] AC 811 at [73-76], the Supreme Court identified "*valuable judgments in the Court of Appeal*" explaining what the PSED requires. For instance:

    (i) At [75], the Supreme Court referred to the case of *Bracking v Secretary of State for Work and Pensions [2013] EWCA Civ 1345, [2014] Eq LR 40* which clarifies that the PSED "*must be exercised in substance, with rigour, and with an open mind*" (per Aikens LJ in *R (Brown) v Secretary of State for Work and Pensions [2008] EWHC 3158 (Admin), [2009] PTSR 1506* , para 92).

    (ii) At [75], the Supreme Court further approved the principle set out in *R (Hurley & Moore) v Secretary of State for Business, Innovation and Skills* [2012] EWHC 201 (Admin) according to which, it is for the decision-maker

to determine how much weight to give to the duty: the court simply has to be satisfied that "*there has been rigorous consideration of the duty (…) the court cannot interfere … simply because it would have given greater weight to the equality implications of the decision.*"

(iii) Drawing the threads together, the Supreme Court remarked at [74] that having 'due regard' means take account of what is ""*appropriate in all the circumstances" (…) I do not think it is possible to more precise or prescriptive, given that the weight and extent of the duty are highly fact-sensitive and dependent on individual judgment*."

Advice

The Equalities Statement

28. Taking the above legal framework into account, what counts as 'due regard' for the purposes of s.149 of the EqA 2010 depends on what is appropriate in the circumstances. The extent of the duty is highly fact-sensitive and will change from case to case. However, given BMS' unique status as the oldest and most historically significant Synagogue in the country, its recognition as a 'cathedral Synagogue' with over three hundred years of continuous worship and its Grade I listing that reflects its exceptional heritage value, I consider that an Equalities Statement accompanying a proposed development of this scale would have to demonstrate a sufficient understanding of the specific potential impacts of the development proposal on the Jewish community at BMS.

29. Furthermore, given the positive obligations on decision makers subject to the PSED, the City of London will have to go beyond merely demonstrating an understanding of the religious practices of the Jewish community at BMS to actively considering the positive steps it can take through its decision making functions as a planning authority to meet the needs of those who worship at BMS, remove or minimise disadvantages facing them, foster good relations and advance equality of opportunity.

30. The Equalities Statement notes at paras 3.27-3.28 that 2% of the City of London's residents are Jewish and BMS is one of a number of places of worship in close proximity to the site.

31. BMS is directly addressed from para 3.43 onwards where the Equalities Statement makes the following observations:

    (i) BMS is located approx. 30m north of the site. It is a place of worship and a community facility. It is the oldest Synagogue in the UK and the only Synagogue in Europe to have held regular services continuously for more than 300 years.

    (ii) It notes the times of Shabbat and the fact that the Synagogue is used for various celebrations, as well as the fact that it is of significance to the Jewish community because of its heritage.

    (iii) It remarks that the Synagogue is open to visitors and received a lottery grant in 2019.

32. The Equalities Statement notes in the table at page 19 that impacts of the proposed development may have different impacts on the protected characteristic of religion or belief due to how places of worship are used for religious ceremonies. Specific impacts to BMS are noted from para 4.38 and are said to include:

    (i) **Townscape and visual impact**. The Equalities Statement concludes that the proposed development will alter the visual backdrop to the Synagogue from the courtyard but that this does not impact on the use of the Synagogue or its courtyard for religious activities.

    (ii) **Noise**. However, the Equalities Statement notes that contractors will have close regard to the religious calendar to limit disruption during religious events.

    (iii) **Daylight and sunlight**. The Equalities Statement notes that the Synagogue is sensitive due to the reliance of candlelight only during religious ceremonies where the congregation need to be able to read from the Torah. However, it goes on to note that the Synagogue currently receives very low levels of light. It further states that as the proposed development would lead to a small reduction in the amount of daylight received, it is unlikely to affect the current use of these areas or increase the requirement for artificial lighting.

(iv) **Night sky visibility**. The Equalities Statement addresses the proposed development's potential impact on the ability to observe the night sky during Shavuot, noting that the proposal will not materially affect the ability to observe the night sky from the courtyard. However, the Equalities Statement concludes that high levels of light pollution in London limit the potential for night sky observations.

33. The s.149 duty is primarily one of process rather than outcome ('have due regard'). I therefore consider that the Equalities Statement contains just enough information on the potential daylight and sunlight impacts of the proposed development for the reading of religious texts to discharge the PSED. However, it completely fails to address the potential daylight and sunlight impacts on the ability to continue carrying out circumcisions in the Synagogue. This was raised in BMS' objections so it should have been addressed in an updated Equalities Statement.

34. Concerning the night sky view, the Equalities Statement refers to the potential impacts on the continuing observance of Shavuot but is entirely silent on the importance of the night sky view to the weekly observance of Shabbat, the daily obligation to recite the *Shema Yisrael* and the monthly blessing on the appearance of the new moon. BMS' objection raised these specific points and explained the ways in which the development proposal's obstruction of the night sky view might prevent these religious practices from taking place.

35. Without giving "*rigorous consideration*" to these specific issues, it is hard to see how the Equalities Statement can safely conclude that the recognised alterations to the visual backdrop to the Synagogue from the courtyard would "*not impact on the use of the Synagogue or its courtyard for religious activities*."

36. I consider on balance that the Equalities Statement is not sufficiently detailed on the potential impacts on the Jewish community at BMS to continuing worshiping in accordance with their faith. The failure of the Equalities Statement to address several key aspects of the night sky view and the importance of adequate lighting for circumcisions does not comply with the Guidance and case law which requires the PSED to be "*exercised in substance, with rigour"* (*Bracking*) and "*have regard to*

meeting needs which arise as a consequence of religious belief" (para 3.30 of the Guidance).

37. It is trite that planning authorities must carefully balance different (sometimes competing) factors and decide how they should weigh in the overall balance. However, certain factors will always weigh more heavily in the balance than others. The Guidance clearly states "*the greater the relevant potential impact, the higher the regard required by the duty*." Considering the importance of the PSED and the extent of the potential impacts of the development proposal on the Jewish community at BMS, I consider that this is a case that warrants the heightened regard envisaged by policy and by extension, substantial weight in the overall planning balance.

Statement of Reasons

38. With some exceptions, planning committees are not generally required to give reasons for decisions to grant planning permission. The extent of the duty to give reasons for granting planning permission was discussed in *Dover DC v Campaign to Protect Rural England (Kent)* [2017] UKSC 79; [2018] 1 W.L.R. 108 where the at [59], the Court held *"(...) it should not be difficult for councils and their officers to identify cases which call for a formulated statement of reasons, beyond the statutory requirements. Typically there will be cases where, as in Oakley and the present case, permission has been granted in the face of substantial public opposition and against the advice of officers, for projects which involve major departures from the development plan, or from other policies of recognised importance (such as the "specific policies" identified in the NPPF - para 22 above). Such decisions call for public explanation, not just because of their immediate impact; but also because, as Lord Bridge pointed out (para 45 above), they are likely to have lasting relevance for the application of policy in future cases.*"

39. If the City of London decides to grant planning permission, I consider that such a decision would fall within the categories envisaged by the Supreme Court where a formulated statement of reasons would be required. This is because:

    (i) There is substantial public opposition to the proposals.

    (ii) A very similar proposal was refused in 2021 and the area now enjoys heightened statutory and policy protections due to its recent designation as a Conservation

Area. The proposal is therefore likely to involve major departures from the development plan and other policies of recognised importance.

(iii) Given the City of London's recent decision to refuse a similar application and the recent designation of the Conservation Area, a formulated statement of reasons would be required to explain consistency of decision making.

(iv) The decision would be likely to have both an immediate impact on the Jewish community at BMS (amongst others affected by the proposals) and lasting relevance for the application of policies relating to tall buildings and conservation areas in future cases.

(v) Section 149 contains a positive duty to have 'due regard' to equalities impacts. In the absence of a formulated statement of reasons, it would otherwise be difficult to ascertain whether the City of London complied with this duty.

40. These observations on the duty to give reasons are relevant to understanding how an eventual decision to grant planning permission might be otherwise vulnerable to legal challenge. For the reasons stated above, a complete failure to give reasons in this case could be subject to legal challenge.

41. However, if reasons are given and the committee remedies the inadequacies of the Equalities Statement by robustly considering the specific potential impacts to BMS, it would be hard to argue that the PSED has not been discharged. That is unless the committee nonetheless gives irrational reasons for granting permission (a high hurdle). In any event, even if the committee robustly considers the potential equalities impacts on BMS but nonetheless decides to override the needs of the Jewish community in favour of the development proposal, I am of the view that a clear statement of reasons would be required.

Conclusions

42. My conclusions are as follows:

(i) The Equalities Statement does not comply with s.149 of the EqA 2010 as it does not sufficiently address the potential impacts of the planning application on the ability of the Jewish community at BMS to continue worshipping in accordance with their faith. While it addresses some points (reading religious texts by natural light), it completely ignores several important potential impacts on the ability of the Jewish community at BMS to continuing worshipping in accordance with their faith.

(ii) If planning permission is granted, I consider that a formulated statement of reasons will be required to demonstrate compliance with the PSED.

CLAIRE NEVIN

18 November 2024

Francis Taylor Building

Inner Temple

London EC4Y 7BY

Historic Buildings
London and Middlesex Archaeological Society

c/o The Museum of London, London Wall, EC2Y 5HN
[redacted]

Ms Anna Tastsoglou
Environment Department
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

22 November 2024

Dear Ms Anna Tastsoglou;

Re: Bury House, 31 Bury Street, EC31 5AR
Full Planning Permission: 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and Listed Building Consent: 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

The LAMAS Historic Buildings Committee **object** to the planning application 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and listed building application 24/00011/LBC (Holland House 1 - 4, 32 Bury Street) on the grounds of the harm they would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.
We therefore recommend that these applications be refused.

The planning application 24/00021/FULEIA and associated application for listed building consent 24/00011/LBC includes for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; erection of four storey extension resulting in ground plus 8 storeys at Holland House; and a three storey extension resulting in ground plus 5 storeys at Renown House.
24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street).

We have written on previous occasions in 2021 expressing our objections to the planning application submitted for 20/00848/FULEIA Bury House, 31 Bury Street, London, EC3A 5AR. As you will know, this scheme was subsequently refused in June 2022, with the reason cited as:

1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal).

2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site, as highlighted by Historic England in their letter of objection.

The application 24/00021/FULEIA for the demolition of Bury House and erection of a new building submitted in January 2024 and the subsequent variation submitted in October 2024 is, in our opinion, materially of little difference to the previous 2020 scheme. The committee therefore still remain of the opinion that:

(a) The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will still profoundly harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings. The reason as stated in paragraph one of the letter of rejection therefore still relates.

(b) Whilst it is acknowledged that the proposed building has a slightly amended profile, we do not consider that this provides sufficient mitigation to change the less than substantial harm on the London View Management Framework view as stated in paragraph two of the letter of rejection.

(c) The variation submitted in October 2024 makes no material alterations to the proposals24/00011/LBC (Holland House 1 - 4, 32 Bury Street) Holland House is a Grade II* listed building first listed in June 1972 and amended in September 1997. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys.

The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.

The City of London Local Plan January 2015; Policy DM 12.2 Development in conservation areas identifies that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area.

Policy DM 12.2 further identifies that: In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale. The construction of a four-storey roof extension would, in our opinion, significantly alter the vertical emphasis, bulk and scale of the Grade II*listed Holland House.Policy DM 12.3 Listed buildings states:

- To resist the demolition of listed buildings.
- To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

Para 3.12.14 further identifies that: Where extensions are proposed, in order to be acceptable, they should be located where they minimise the effect on the listed building concerned and should always be appropriate in scale and character. The bulk, height, location and materials of roof extensions will be particularly critical and should be appropriate to the period and style of the building and its setting.
This has been reinforced by the establishment of the Creechurch conservation area, which encompasses both the Grade II* Holland House and the Grade I listed Bevis Marks synagogue.

The application for listed building consent 24/00011/LBC for the partial demolition of the Grade II* Holland House and the construction of four further storeys would cause a significant detrimental effect on the Grade II* listed building, in contravention of Policy DM 12.3 Para 3.12.

The proposed development is within the Creechurch conservation area, and in the opinion of the committee, will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2.

For the reasons set out above, the LAMAS Historic Buildings Committee therefore continue to object to the planning application 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and application 24/00011/LBC (Holland House 1 - 4, 32 Bury Street) for listed building consent on the grounds of the harm they would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.

We recommend that these applications be refused.

Yours sincerely,

Vicki Fox (Hon. Secretary)
LAMAS – Historic Buildings & Conservation Committee

From:
To:
Cc:
Subject: Proposal for 43 storey tower at 31 Bury Street (ref 24/00021/FULEIA)
Date: 27 November 2024 15:46:45

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I wish to register my strongest objections to your proposal for the development of the above project. Please take these comments into account.

- The proposed development would cause substantial harm in heritage terms to the significance of Bevis Marks Synagogue and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.
- The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.
- The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.
- The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Bevis Marks Synagogue is a hugely significant building both within the City of London and on a national level, recognised by its Grade I Listed status. The building dates from 1701 and is the oldest and most historically significant synagogue in the country. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance.

This application follows a previous, similar application by the same applicant (ref. 20/00848/FULEIA) which was refused in 2022 for two reasons, relating to the impact of the proposal on the setting of Bevis Marks Synagogue, and the setting of the Tower of London. The reasons for refusal in 2022 apply today.

The applicants say they have made changes to the design and are now

providing space that can be used by community groups and small businesses, which represents public benefits that tip the planning balance in their favour. However, the design changes will make hardly any difference to the impact on the Synagogue, and in any event are counterbalanced by the fact that the heritage ‘bar’ is now even higher as the Synagogue has recently gained the added status of being within a Conservation Area. The ‘public benefits’ would confer little to no benefit upon the Synagogue and the community it supports, and - whilst they may benefit some people - would hardly begin to counter the damage the tower would cause.

Please register my strongest objection to this proposal and inform me of your decision by return.

Many thanks,

Ketty Ozer
6 Huson Close
London
NW3 3JW

PLANNING APPLICATION (24/00021/FULEIA) - OBJECTION
BURY HOUSE, 31 BURY STREET

From:
PNatali
14LeasideAvenue
London
N103BU

Date: 27 November 2024

Application Reference:	24/00021/FULEIA
Address:	Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Proposal:	Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.
Case Officer:	Anna Tastsoglou

I object to this planning application (24/00021/FULEIA) at Bury House, 31 Bury Street.

I have previously objected to a similar application (20/00848/FULEIA) on the same site.

The previous application (20/00848/FULEIA) was refused on 22 June 2022 by the City Corporation, in part, because "*The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality)*.".

I objected to the current application on 2 April 2024. That application has now been amended and additional information submitted (as per your letter of 8 October 2024).

The current application (24/00021/FULEIA) is of no greater merit than the previous, refused, application; the current application would also have an overbearing and overshadowing impact on the Synagogue and its courtyard and it would be at the expense of the Jewish community. I am therefore very concerned about the current application.

Bevis Marks is the oldest continually functioning Synagogue in the UK, with families able to trace their roots back to the early days of the community in the 17th century. It is an important part of this country's multi-faith heritage and is an active and vibrant Synagogue and community. It is a pity that the wannabe developer is seeking to obtain planning consent for a scheme that will be detrimental to the Synagogue, its community and its wider place in Britain's heritage.

My objections to the current proposals are many and include, in part, the following:

- The proposed 40+ storey tower would completely overwhelm the Grade 1 Listed Synagogue building, which is of enormous historic and cultural significance.
- The proposed tower would overshadow the Synagogue and its courtyard for much of the day. It would further reduce the already minimal daylight that penetrates into the Synagogue, making it even more difficult to conduct worship. It would also reduce the ability for the Synagogue's courtyard to be used for rituals and celebrations.
- Although the wannabe developer's Design and Access Statement sets out (at 5.4a3) that the current proposals include a height reduction from the previous proposals such that, it is claimed "*The height reduction and stepped form of the upper sections are purposely designed to minimise any adverse impact to views from the [Synagogue's] courtyard*", this is disingenuous as the wannabe developer is incorrect *viz* in order to minimise any adverse impact to views from the Synagogue's courtyard there should be NO new development visible from the Synagogue's courtyard. (See also comments concerning light above.)
- Irrespective of any qualities of design or sustainability, a building of the size and scale proposed is simply inappropriate to be built so close to a Grade 1 Listed Synagogue building; a similar approach would not be permitted adjacent to St Paul's Cathedral and there is no good reason for such an approach to be acceptable adjacent to Bevis Marks Synagogue.
- The City of London's heritage, and the Jewish community's centuries old ability to worship at the Synagogue, should not suffer at the expense of alleged benefits that the wannabe developer contends might become available elsewhere in the area. Britain's Jewish community and its heritage do matter and must be preserved.
- The development site is within the Creechurch Conservation Area. Current planning policy is not to allow tall buildings in Conservation Areas, so there is a direct conflict between the proposed development and the statutory development plan. The City Corporation would be disingenuous were it, on the one hand, to create the Creechurch Conservation Area and, on the other hand, to remove the very restrictions pertaining to the Creechurch Conservation Area that benefit the Synagogue and its setting.

Further, I note the following:

- The objection to the application that appeared in The Times on 26 November 2024 (Appendix A, attached), the terms of which I wholeheartedly agree.
- The Ministry of Housing, Communities and Local Government has now restricted the granting of permission by the Corporation, to allow the government to consider the case: https://www.bbc.co.uk/news/articles/cgr08wq4qn0o.
- It is high time that the Corporation put an end to the repetitive actions of wannabe developers seeking to harm Bevis Marks and the Jewish community. It is unconscionable that year on year wannabe developers' actions leave the Jewish community and its supporters feeling under constant threat of development taking place around Bevis Marks, which results in so much energy having to be devoted to defeating the wannabe developers at every turn, all at the expense of the community wishing to be able to continue with its continuing peaceful worship at Bevis Marks.

I request that the City Corporation rejects the proposed development.

Thank you for your attention.

APPENDIX A

Letter in The Times 26 November 2024

Synagogue in peril

Sir,

For more than 300 years the Grade I listed Bevis Marks Synagogue has been at the heart of British Judaism. It is one of the most natural light-sensitive places in London, where extensive reading of printed texts is fundamental to worship. That may become impossible, especially in the winter months, if a 43-storey tower is built at 31 Bury Street, overshadowing the synagogue and its courtyard. The proposal will be considered by the City of London planning committee on December 13. A similar proposal was rejected in 2022 because of the damaging impact on the synagogue and the Tower of London. The former is now included in a conservation area, which ought to give further protection, but the City of London is trying to undermine this. More than 1,340 objections have been received and we urge the committee to reject the plan.

Sir Michael Bear, lord mayor of London 2010-11; **Lord Levene of Portsoken**, lord mayor of London 1998-99; **Rachel Blake**, MP for the Cities of London & Westminster; **the Right Rev Sarah Bullock**, Bishop of Shrewsbury; **Sir Stuart Lipton**; **Professor Sir Simon Schama**; **Baroness Deech DBE KC**; **Lord Dyson**; **Rt. Hon Lord Howard of Lympne CH KC**; **Baroness Neuberger DBE**; **The Rt. Hon Lord David Triesman**; **Lord Wolfson of Tredegar KC**, shadow attorney-general; **Phil Rosenberg**, president of the board of deputies of British Jews; **Keith Black**, chair of the Jewish leadership council; **Professor Lucy Noakes,** president of the Royal Historical Society; **Professor Miri Rubin**, president of the Jewish Historical Society of England; **Rabbi Shalom Morris**, Bevis Marks Synagogue; **Rabbi Joseph Dweck**, senior Rabbi S&P Sephardi Community; **The Very Rev Prof Sarah Foot**, Dean of Christ Church, Oxford; The Rev **Laura Jorgensen**, St. Botolphs without Aldgate and area dean of the City of London; **The Rev Josh Harris**, Priest-in-Charge at St Katharine Cree; **Sadiya Ahmed**, founder of Everyday Muslim Heritage and Archive Initiative; **Tom Holland**, FRSL; **Simon Sebag Montefiore**; **Professor Sir Christopher Clark**, regius professor of History at Cambridge University; **Professor David Feldman**, Director of Birkbeck Institute for the study of antisemitism; **Dr Jaclyn Granick**, senior lecturer in modern Jewish history, Cardiff University; **Abigail Green**, professor of Modern European History at Oxford University; **Professor Tony Kushner**, The Parkes Institute, University of Southampton; **James Parkes**, professor of History; **Professor Laura Leibman**, Princeton University, Leonard J. Milberg ’53 professor in American Jewish studies and president of the Association of Jewish studies; **Professor Peter Mandler**, professor in Modern Cultural History at Cambridge University; **Professor Lyndal Roper**, Regius professor of History, Oxford University; **Dr Mia Spiro**, head of Theology and Religious Studies at Glasgow University and president of the British and Irish association for Jewish Studies; **Dr Tom Stammers**, reader in Art and Cultural History at the Courtauld Institute; **Professor Zoe Waxman**, professor of Holocaust Studies at Oxford University; **Professor William Whyte**, professor of Social and Architectural History at Oxford University.

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From:
PNatali
14LeasideAvenue
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APPENDIX A

Letter in The Times 26 November 2024

Synagogue in peril

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Anna Tastsoglou
Planning Team
Environment Department
City of London
PO Box 270
Guildhall
EC2P 2EJ

15 November 2024

Dear Ms Tastsoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Follow-Up Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we write further to our previous letter dated 15 May 2024, in relation to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

This letter comprises a follow-up objection including:

- Further evidence in relation to daylight/sunlight which has been prepared on behalf of our client; and
- Responses to the letter prepared by the Applicant's agents DP9 dated 27th September 2024, specifically in relation to the GIA Lunar Transit Study;
- A letter from Professor Barry Stiefel, Professor of Historic Preservation & Community Planning at the College of Charleston, regarding the significance of the sky view for Bevis Marks Synagogue; and
- The findings of a review of the applicant's Equalities Statement prepared by the barrister Claire Nevin.

Generally

Our client's position remains that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.

As you are aware, a previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. It is abundantly clear that the building now proposed will have just as much impact upon the Synagogue and the other heritage assets as the one proposed previously, and that the only material change in circumstances is that the area is now designated as a Conservation Area, which means that heritage impacts should attract **even greater weight**, and Policy CS14(2) of the City Plan (which contains a strong presumption against tall buildings in Conservation Areas) is engaged.

It is clear the applications should be refused, for the following reasons (inter alia):

1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and empirical evidence of poor daylighting.

2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused.

4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration.

5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use.

6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits.

7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it).

As planning officers of undoubted integrity, I trust you and your colleagues will recognise the above, and also that any attempt to justify recommending approval would be both improper and wide open to legal challenge.

Bevis Marks Synagogue Daylight Report

On behalf of our client, Prof John Mardaljevic and Dr Stephen Cannon-Brookes (respectively of Daylight Experts and Cannon-Brookes Lighting and Design) have prepared a report regarding the daylight position in the Synagogue. The report (enclosed at **Appendix 1**) provides an assessment of the existing daylight levels in Bevis Marks Synagogue and considers how these would be likely to be affected by proposed development.

It represents the only empirical study of the Synagogue undertaken by anyone. All assessments made by third party consultants are based on assumptions and estimates.

The study was originally commissioned in 2022 in the wake of the then planning applications for very damaging tall office towers on the sites of 31 Bury Street and 33 Creechurch. Whilst the original planning applications for those sites have since been refused/withdrawn, there is now a fresh planning application for 31 Bury Street; hence the study results, which cover a two-year period, are of considerable topicality.

Background

The Synagogue was originally designed to be well daylit, with large windows on all four sides which satisfied both the spiritual and functional aspects of worship. Members of the congregation expect to be able to read during services using daylight. The point is well made by this illustration from 1884.



Figure 1: Bevis Marks Synagogue, 1884

Over the years, tall buildings have been constructed on neighbouring sites which has had a significant effect on the daylighting of the interior. The surrounding courtyard has increasingly been shaded from the sky, and this has resulted in a progressive lowering of internal daylight levels within the Synagogue.

Methodology

The report is informed by a long-term assessment of the lighting levels at the Synagogue which was carried out between 26th February 2022 to 2nd April 2024. The assessment was carried out using two illuminance meters, which are widely used to record light levels in museums and other heritage buildings.

The illuminance meters were placed in the central area of the ground floor (Sanctuary), both at a height normal for holding a prayer book. The two locations were selected to capture typical daylight levels experienced on the ground floor of the Synagogue. Light levels were recorded at five minute intervals continuously throughout the monitoring period.

Daylight is measured in lux units (lx), which can be understood as follows:

> Below 25lx - many occupants, particularly the elderly, will experience difficulty reading. The Synagogue is likely to appear drab and gloomy.
>
> Between 25lx - 50lx - many occupants may be able to read printed paper, provided the text is not too small. 50lx is generally regarded as sufficiently dark that most museum exhibits will not be harmed by exposure to that amount of light.
>
> Between 50lx - 100lx - most/all of the occupants are likely to be able to read printed paper, and the Synagogue is likely to begin to appear pleasantly daylit.
>
> Above 100lx - the Synagogue will be perceived as having a more pleasant/daylit appearance.

Existing Daylight Levels

The results of the assessment of existing daylight over a two+ year period showed that:

> The Synagogue is a fundamentally daylit building. Some electric lighting was installed in the 1920s, but artificial lighting is culturally inappropriate, and furthermore there is little if any scope to install more lighting in what is now a Grade 1 Listed building of the highest significance. In winter, the daylight levels are barely adequate.
>
> In general, daylight levels at the Synagogue are at a 'tipping point' where additional shadowing by nearby proposed developments could plunge the Synagogue into permanent winter daylight conditions, or worse.

Figure 2 in the report shows the typical daily hours lux levels achieved over the monitoring period:

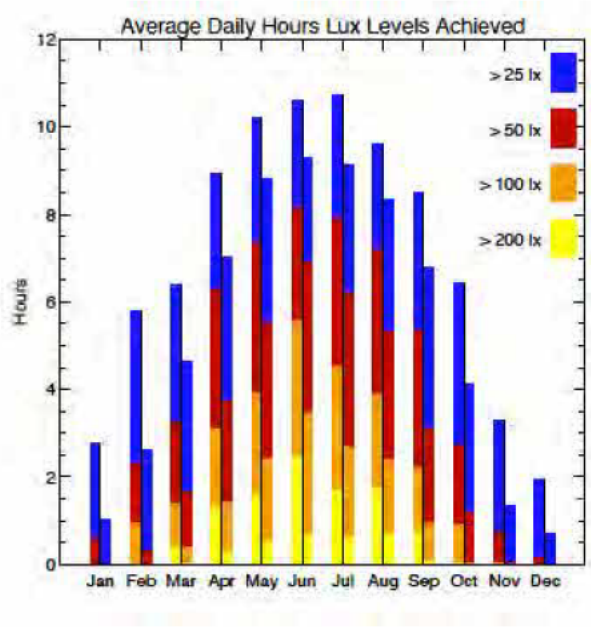


Figure 2: Average Daily Lux Levels Achieved

It is clear that in the winter months particularly, daylight in the Synagogue is very limited. Indeed, for a quarter of the year, the light levels never exceed 100lx (i.e. they are always blue or red on the graph above). Even in the summer months, much of the daylight is still at or below 100lx.

The report also considers how surrounding development that overshadows the courtyard of the Synagogue has an impact on internal light levels. On sunny days, the results show a pattern of a large dip in internal light level readings between around 08:30 to 10:00[1], after which light levels rise again. This is a result of the overshadowing of the Synagogue by neighbouring buildings.

Figure 5 in the report, below, demonstrates that when the courtyard is shaded by the very tall neighbouring building at One Creechurch Place, this has a significant and direct impact on internal light levels. For example, at 09:00 on 8 May 2022, the courtyard was fully in shadow. The illuminance levels (shown by the red and blue lines representing each illuminance meter) therefore dropped significantly (to below 25lux in one case, and below 50lux in the other); at 10:00, when the courtyard was no longer in shadow, the illuminance levels recovered.

The report confirms that this is a persistent pattern across the monitoring period which could not be explained by cloud patterns etc. This demonstrates the significant impact that the development of tall buildings in the vicinity of the Synagogue has already had on internal light levels.

[1] The timing will vary according to the date, but the phenomenon will occur in any event

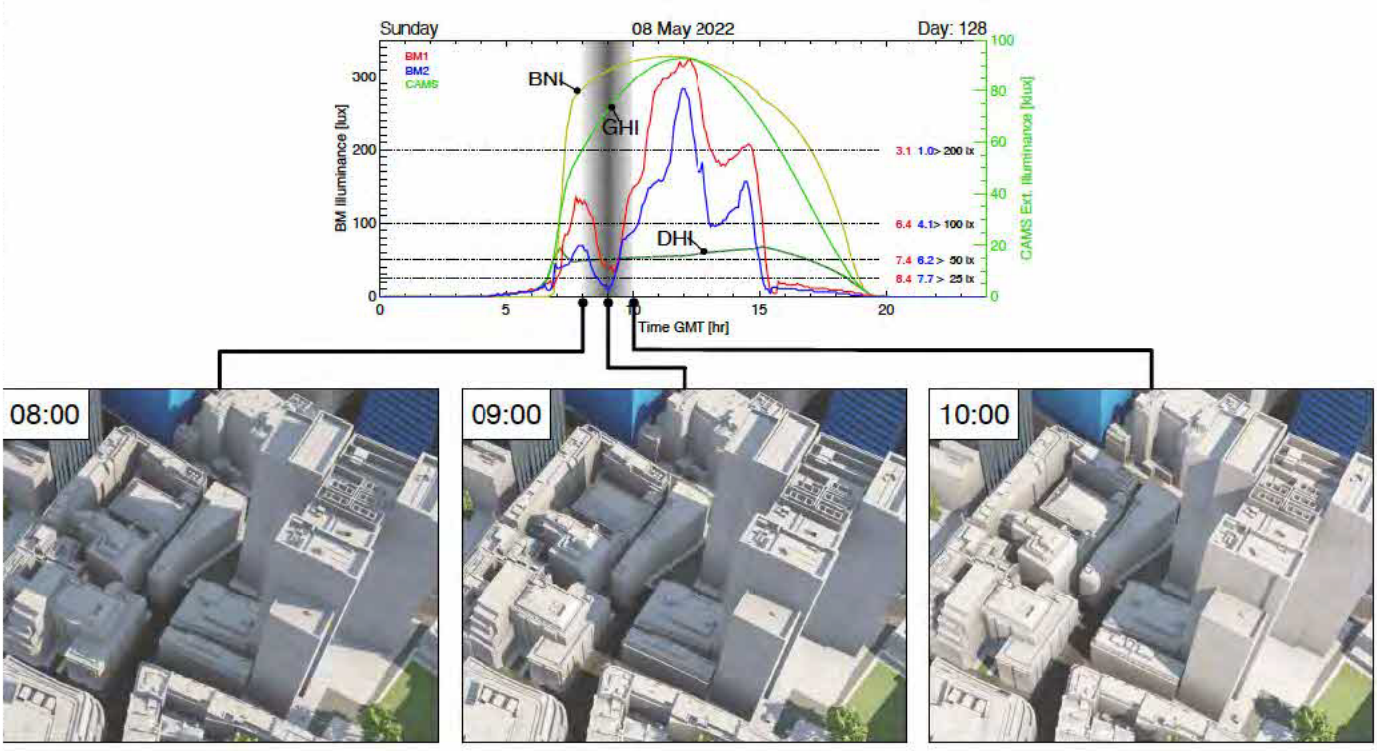


Figure 3: Impact of One Creechurch Place shadow on Bevis Marks

Potential Impact on Daylight Levels

The report goes onto consider the potential further impact on daylight levels within the Synagogue, should the proposed tall building at 31 Bury Street be approved and built. Figures 4 and 5 below show that for 31 Bury Street, on the same day (i.e. 8 May 2022), its shadow would begin to encroach on the Synagogue courtyard area around 11:00, and between 12:00-13:00 the courtyard area is heavily shaded, with shadow gradually receding until 14:00. Figures 4 and 5 relate to light monitors BM1 and BM2 respectively, with the pink and bright blue lines showing the position with 31 Bury Street in place.

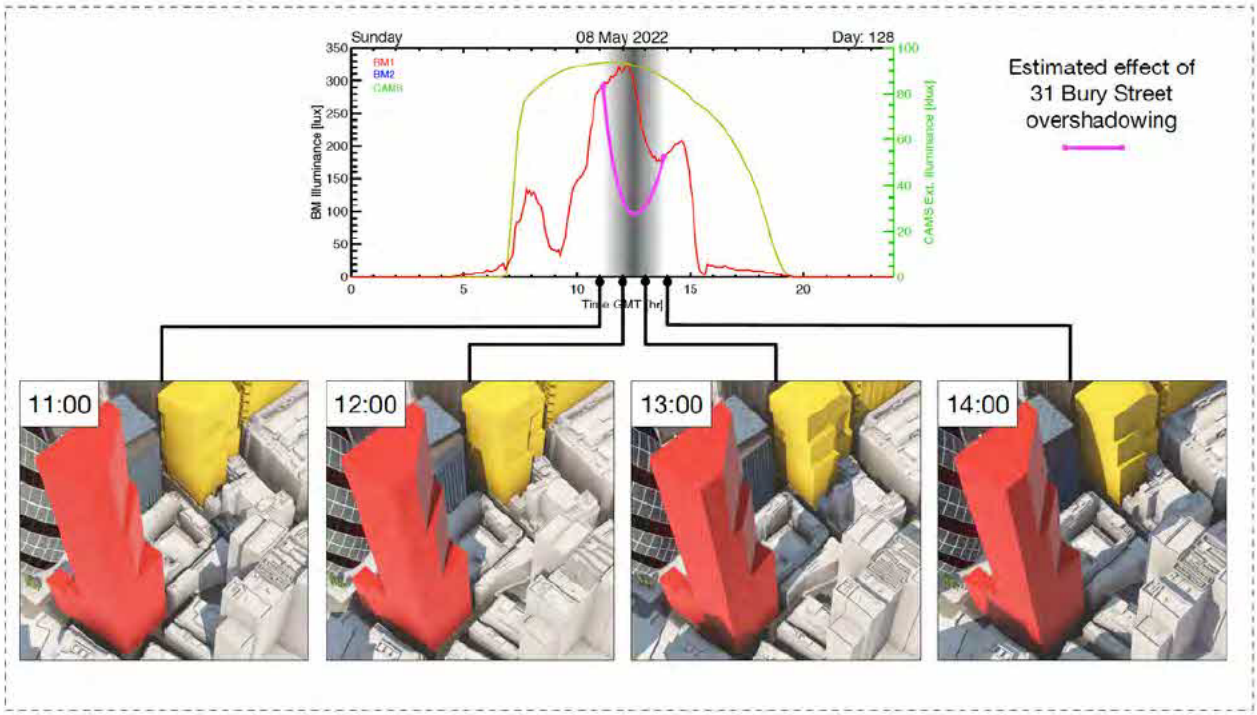


Figure 4: Progression of shadow cast by proposed development on Bevis Marks on light monitor BM1

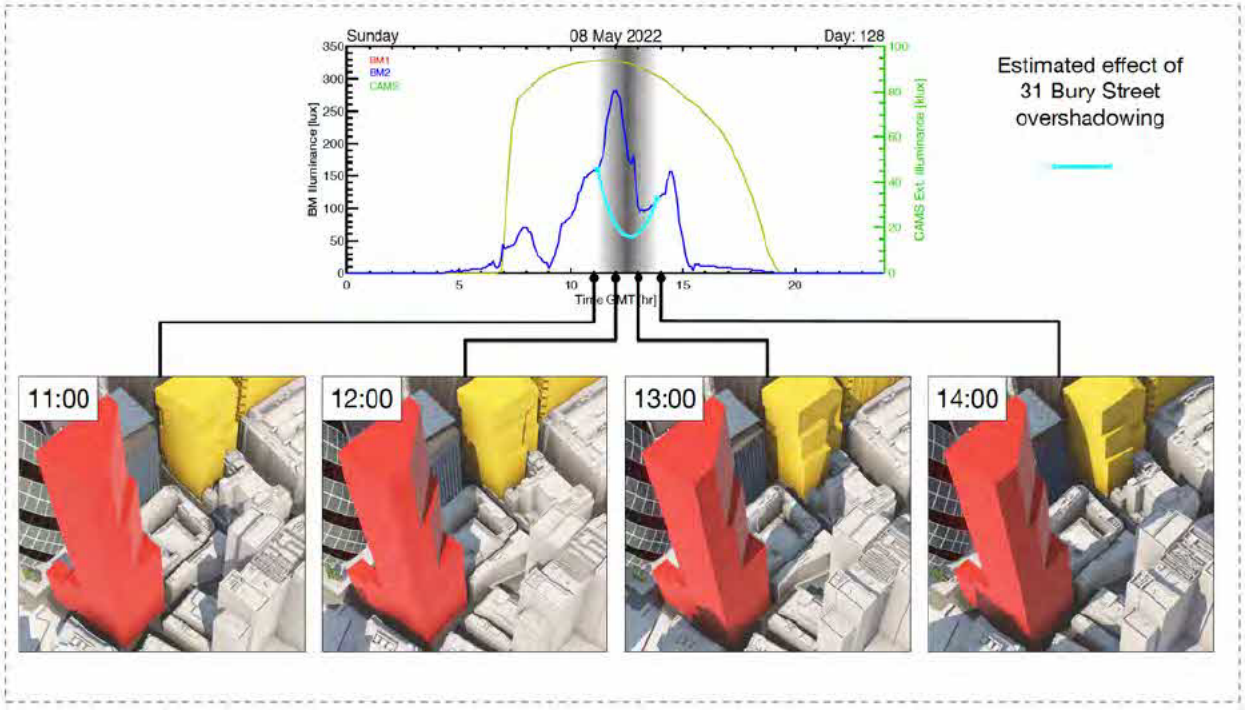


Figure 4: Progression of shadow cast by proposed development on Bevis Marks on light monitor BM2

The cumulative effect of the proposed development with One Creechurch Place is severe and would result in an unacceptable loss of light to the Synagogue.

Conclusions Regarding Daylight

This report contains the most thorough data available regarding the existing position of daylight in the Synagogue. It confirms that daylight levels at the Synagogue are at a 'tipping point' where additional shadowing by nearby proposed developments could plunge the Synagogue into something close to permanent winter daylight conditions, or worse. The projection that has been done for the effect of the proposed tower at 31 Bury Street shows a dramatic worsening of the Synagogue's daylight, resulting in an unacceptable cumulative effect.

This new evidence is of sufficient importance that we request formally that you require the applicants to respond to it in detail.

Response to DP9 letter dated 27th September 2024

The Applicant's agent, DP9, has prepared a detailed response to our previous letter dated 15th May 2024. This includes at Appendix 3 a Lunar Transit Study prepared by GIA.

Lunar Study

Rabbi Morris of Bevis Marks Synagogue has reviewed GIA's lunar study in great detail, and raises a number of issues with the way that the data has been presented, in relation to the practical matters that affect the Synagogue and its special requirements. His assessment is enclosed at **Appendix 2**.

GIA have reported that London has cloudy conditions 58% of the time based on information gained from the website https://weatherspark.com. As a result, they conclude that the moon is only visible 2.2% of the time from Bevis Marks Synagogue's courtyard. In reality, cloud cover is by no means a binary matter - it often changes over short periods of time, and often the moon can be seen through a veil of cloud. In contrast, buildings are fixed; once a building is constructed, for all intents and purposes it becomes perpetually densely 'cloudy' with respect to the lunar visibility.

Beyond this, the variability of climate conditions itself plays an important role in the monthly 'Kiddush Levana' rituals. Jews go outside after dark looking to see whether or not the moon is visible, wherein a cloudy sky is considered to be a bad omen, and a clear sky a positive one, as it allows for the prayer to be recited. The fixed reduction of visibility by the proposed tower would be a permanent obstruction, removing this variability which is central to the meaning of the ritual.

Furthermore, as reciting the prayer only takes a quarter of an hour, the preservation of sufficient unobstructed sky allows for the possibility that any cloud cover will pass, thus enabling the prayer to be recited despite earlier cloudy conditions.

Rabbi Morris has reviewed GIA's data and finds that the proposed development would prevent visibility of the moon in, on average, three months of the year when it is currently visible. At present, the Kiddush Levana prayer can be recited on average in nine months of the year. This is therefore a very significant reduction in the number of months of the year in which it is possible to recite the prayer.

GIA go on to claim that the moon is currently only visible for 2.2% of the time, and the proposed development would reduce that only to 1.8%, implying this is such a small change that it is of little consequence. However, that is a complete mischaracterisation of the position. Even if the figures were correct, the reduction amount is considerable. It is trite to say so, but as something gets smaller, it becomes more precious, and so the sensitivity to further loss becomes more acute.

It is noted that BRE has also been instructed to review the GIA report on behalf of the City of London, and that they reach a similar conclusion to the rabbi:

"With both the consented and proposed developments in place (in the cumulative scenario), the opportunity to view the moon from the observer location used by worshippers at Bevis Marks Synagogue when reciting Kiddush Levana would reduce by 51% on average throughout a full lunar cycle, compared to the existing baseline."

Finally, and very importantly, this is a matter which is deeply entwined with the history of Judaism and of the Synagogue. Below is a woodcut from 1695, showing Jews revering the moon and the stars at the synagogue in Amsterdam.



Figure 5: 1695 Woodcut

The synagogue shown is a relatively low building, open to the sky, exactly as Bevis Marks Synagogue was when it was built around the same period.

Below is another image, showing the same phenomenon at a synagogue in Germany in 1726.



Figure 6: Illustration of a synagogue Germany (1726)

Enclosed at **Appendix 3** is a letter from Professor Barry Stiefel, Professor of Historic Preservation and Community Planning at the College of Charleston. Professor Stiefel is a leading expert in Western Sephardi Synagogue architecture. Professor Stiefel's letter sets out in detail the cultural and religious significance of the sky view for the community at Bevis Marks Synagogue, with reference to religious observances, daily prayers, festivals, and its cultural, historic, mystical and symbolic significance. Professor Stiefel concludes that even partially blocking the important sky view would lead to disruption for the Sephardic Jewish community at Bevis Marks Synagogue.

What we have here is not only very important to the modern day religious and cultural rituals of a minority ethnic group, but something which is fundamental to the significance of the heritage asset. The sky view is not just a matter of aesthetics; it serves a purpose which has always been an important and integral part of the functioning of the building.

Enabling Development and Viability

The letter prepared by DP9 states that they do not make an 'enabling development' argument and we understand from our previous discussions that viability evidence has not been requested from the applicant. We have sought advice from Lord Banner K.C. on this matter and his advice (enclosed at **Appendix 4**) is that:

"it would be amply open to the Council to take the view that the "clear and convincing justification" for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist without (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of harm that would be caused - including viability evidence."

We therefore remain of the view that the applicant should provide viability evidence to demonstrate that the claimed benefits (including heritage benefits) of the scheme cannot be achieved without the extent of harm that would be caused. It is indisputable that a very tall building on the 31 Bury Street site would cause considerable harm to Bevis Marks Synagogue and the Tower of London. The applicants are effectively arguing that the benefits of the proposed development (including heritage benefits) would, in their opinion, outweigh those harms as well as clear conflict with the statutory development plan. For the Corporation to be able to consider that argument, it will require robust evidence that a building of the dimensions proposed (a) can deliver the benefits claimed, and (b) is no taller than necessary for the balance to be capable of being tipped in its favour, i.e. viability evidence.

We again formally request that you require proper evidence from the applicants. If such information is not provided, we put you on notice that this will form part of any legal challenge in due course.

Equalities

Our previous objection raised concerns regarding the Equalities Statement submitted as part of the application. We note DP9's response which states their view that the submitted Statement is sufficient. We have instructed Claire Nevin, a barrister specialising in environmental and human rights law, to carry out a review of the Equalities Statement (enclosed at Appendix 5). The review sets out, in summary, that "*the Equalities Statement is not sufficiently detailed on the potential impacts on the Jewish community at BMS to continuing worshipping in accordance with their faith. The failure of the Equalities Statement to address several key aspects [...] does not comply with the Guidance and case law*". The review concludes that were the City of London to rely on this Equalities Statement alone to discharge their Public Sector Equality Duty (PSED), it would be in breach of the duty.

The decision maker (i.e. the City of London's Planning Committee) must have due regard to the factors set out at Section 149 of the Equalities Act 2010. Ms Nevin concludes that if the City of London were to decide to grant planning permission, a formulated statement of reasons would be required in accordance with the Supreme Court's ruling in *Dover DC v Campaign to Protect Rural England (Kent) [2017]*. A formulated statement of reasons would be required because:

> There is substantial public opposition to the proposals.
>
> A very similar proposal was refused in 2022 and the area now enjoys heightened statutory and policy protections due to its recent designation as a Conservation Area. The proposal is therefore likely to involve major departures from the development plan and other policies of recognised importance.
>
> Given the City of London's recent decision to refuse a similar application, and the recent designation of the Conservation Area, a formulated statement of reasons would be required to explain consistency of decision making.
>
> The decision would be likely to have both an immediate impact on the Jewish community and lasting relevance for the application of policies relating to tall buildings and conservation areas in future cases.

> Section 149 contains a positive duty to have 'due regard' to equalities impacts. In the absence of a formulated statement of reasons, it would otherwise be difficult to ascertain whether the City of London complied with this duty.

It is therefore important that Members of the Planning Committee are made aware that a formulated statement of reasons should be provided in the event that they were minded to resolve to grant permission for the application.

Ms Nevin's review also draws comparisons between the current application at 31 Bury Street, and the application for the 'Tulip' skyscraper, which was refused by the Secretary of State in November 2021 (ref. APP/K5030/W/20/3244984). Bevis Marks Synagogue was amongst the heritage assets considered in the decision, with the Secretary of State finding that the "wider setting" of the Synagogue "*includes a number of office towers, visible from the courtyard.*"

Regarding Bevis Marks Synagogue and a number of other heritage assets, the Secretary of State remarked that the Tulip would "*cause a marked exacerbation in the existing harm from tall buildings to the setting of the assets and the ability to appreciate their architectural or historic significance. The effect would be variously to create an overbearing presence from within the curtilage of the heritage asset (…)*". This clear view expressed by the Secretary of State is a material consideration that must be taken into account when determining the application at 31 Bury Street.

Ms Nevin concludes that: *"It is trite that planning authorities must carefully balance different (sometimes competing) factors and decide how they should weigh in the overall balance. However, certain factors will always weigh more heavily in the balance than others. The Guidance clearly states "the greater the relevant potential impact, the higher the regard required by the duty." Considering the importance of the PSED and the extent of the potential impacts of the development proposal on the Jewish community at BMS, I consider that this is a case that warrants the heightened regard envisaged by policy and by extension, substantial weight in the overall planning balance."*

Conclusions

In summary, none of the material produced by the applicant or their agent in response to our previous objection changes our client's position and our strong objections previously set out. The additional evidence enclosed with this submission provides further reasons why the application should not be approved.

The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence, and because the significance of the sky view is now better understood. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it, let alone to justify a clear conflict with City Plan Policy CS14.

The applications should be refused. However, in order for you to be in a position properly to report them to Committee, we reiterate our request that you require the applicants to respond in detail to the empirical evidence on daylight, and to produce a viability assessment to justify their *de facto* enabling development case. You might also think it appropriate to suggest they produce a robust Equalities Statement to assist you in your reporting on this most important and sensitive matter.

Yours sincerely,



Roger Hepher
Executive Director

Appendix 1 - Bevis Marks Daylight Report 2024

Bevis Marks
Daylight Report 2024

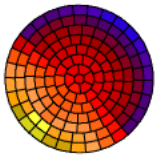
Prof. John Mardaljevic
PhD FSLL FIBPSA

Dr. Stephen Cannon-Brookes
PhD FSLL

Prepared for the Sephardi and Portuguese Congregation

FINAL VERSION: 26/ 10/ 2024





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Executive Summary



Bevis Marks Synagogue, 1884 (John Crowther)

In order to determine if the Bevis Marks Synagogue is at risk from significant loss of daylight due to proposed nearby developments, it is necessary to establish two matters of fact:

1. The current levels of daylight provision in the Synagogue.
2. The expected reduction in daylight provision to the Synagogue caused by the proposed developments.

The first can only be determined reliably by direct measurement of daylight levels in the Synagogue over extended periods. The second can only be estimated using a realistic prediction method which minimises the uncertainty in the outcome.

This report focuses on the findings of a long-term measurement campaign to quantify the daylight provision in the core of the Bevis Marks Synagogue. The measurements, using two conservation grade light meters, were carried out over a two year period from 26th February 2022 to 2nd April2024. Theresultsattestto thefactthattheSynagogueisa functionally daylit buildingforconsiderableperiodsoftheyear:overwinterthedaylightlevelsarebarelyadequate, buttheyimproveconsiderablyf ortheotherninemonthsoftheyear.Thedataalsoshow that thedaylightlevelsi n theSynagoguearеata‘ti ppingpoint’–significantadditi onalshadowing by nearby proposed developmentscould plungetheSynagogueintopermanentwinterdaylight conditi ons,orworse. Thereportalso providesguidanceregarding theselection ofa suitable prediction method to estimatethelossofdaylightprovision to theSynagoguecaused by the proposeddevelopments.

1 Introduction

To set the picture, the Synagogue was designed to be well daylit with large windows on all four sides to meet spiritual and functional aspects of worship. That the latter has always involved the congregation reading during services is confirmed by the presence of lockers beneath every seat, some of which predate the Synagogue and that are still in use. Members of the congregation expect to be able to read during services using daylight, which as of tradition plays a role in the timing of services. This helps to explain why the generous number of original chandeliers were not electrified during the 20th century, since, as in early the 18th century, appropriate candles are expensive and their use is reserved for special services. Furthermore, it is the minimal level of material change since then that earned the current Grade 1 listing of the building, its fabric and furnishings.

Whilst the building and its use remain largely unchanged the same cannot be said for its surroundings and this has had a substantial effect on the daylighting of the interior. The narrow surrounding courtyard has maintained a perimeter of space though one increasingly shaded from the sky by the rising height of adjacent buildings. The consequences of this can be read in the interior with redundant boxes above the upper level windows on the SE and SW walls. In the past these housed blinds to diffuse direct sunlight, now largely blocked by adjacent buildings. Change has been incremental, but always in the direction of lower daylight levels as the height of these buildings increased. An earlier report by surveyor GIA presented the current conditions showing how little direct view of the sky remains from the Synagogue's windows.

Site measurements of light levels indicate that the interior is on the cusp of losing workable levels of daylight under most sky conditions. Review of existing conditions and schematic modelling indicates that the daylighting in the Synagogue is now largely dependent on reflected light from the surfaces of the buildings surrounding the courtyard. This is most obvious during periods of sunlight, the absence of which is easily perceived since levels are considerably lower when sky is overcast. At these times, the current and relatively sparse electric lighting on the columns is utilised, but, as reported, even when members of the congregation tend to congregate around the columns, light levels are insufficient for these to be an effective alternative means of illumination.

2 Measuring the Daylight Levels in Bevis Marks

Illuminance is a measure of the amount of light (i.e. the luminous flux per unit area) under normal viewing conditions. Illuminance has a unit of lux (often shortened to lx). Illuminance is the quantity most commonly used to assess illumination levels in buildings. For example, to specify the artificial lighting in an office, usually something in the range 300lx to 500lx. Verification of an artificial lighting system would be carried out using a lightmeter, e.g. taking measurements at various desks to ensure that the design intent (say, 300lx across the desks) has been achieved.

In contrast to artificial lighting, verification of daylight levels in a building is far more complex. The quantity and quality of daylight in buildings is continually varying due to the natural changes in sun and sky conditions from one moment to the next. These changes have components that are: random (e.g. individual cloud formations); daily (i.e. progression from day to night); and, seasonal (e.g. changing day length and prevailing weather patterns). Accordingly, to be reliable, any measurement of daylight provision in a building must be taken over a period of at least a full calendar year. Daylight levels measured outside vary enormously.[1] For example, in the Midlands (UK), typical daylight levels at noon vary from ~60,000lx in summer to around ~10,000lx in winter. Peak values under the sunniest conditions can reach in excess of ~90,000lx. Half an hour after sunrise (or half an hour before sunset), daylight levels will be around ~1,000lx. Thus, any meaningful assessment of daylight provision indoors must describe the degree of occurrence of,

[1] Here we refer to measurements taken on the horizontal plane in an unobstructed outdoor setting, i.e. with a full view of the hemispherical sky vault.

usually, particular daylight levels throughout the year. How this was achieved for Bevis Marks is described in the sections that follow.

2.1 Daylight Measurement Strategy

Two logging illuminance meters (referred to as BM1 and BM2) were used to record the daylight levels in the Synagogue. The meters employed were newly purchased Hanwell ML4701 LUXBUGS, which are widely used to record light levels in museums and heritage buildings. They were placed in the central area of the ground floor (Sanctuary), as can be seen in Figure 1. BM1 was located on the edge of the Bimah and BM2 on the pew closest to the Ark, both at the height normal for holding a prayer book. These locations were selected to capture the range of daylight levels across the core of the ground floor area of the Synagogue. Perimeter areas, under the balconies were not considered as scaffolding was present around the ground floor windows at the start of monitoring. Light levels were recorded at five minute intervals continuously throughout the monitoring period. There were occasional losses of data due to the practicalities of long-term light monitoring in an occupied space. For example, due to internal memory overflow. And one occasion when BM1 was misplaced for a number of weeks following a wedding.

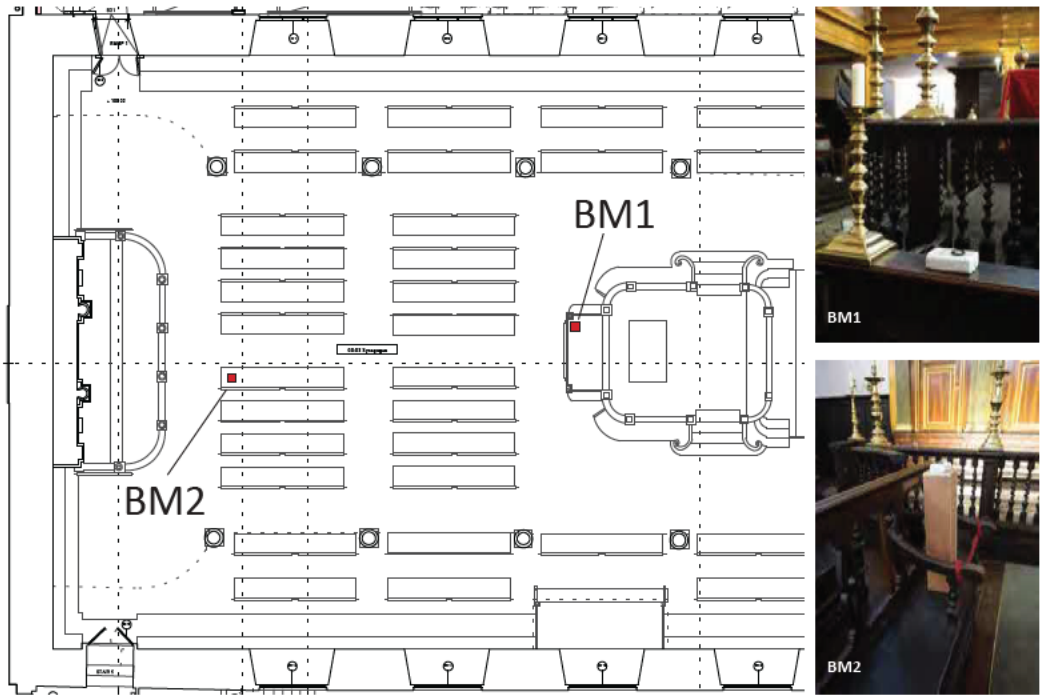


Figure 1: Location of Hanwell loggers BM1 and BM2

2.2 Determining Daylight Provision from the Measured Illuminance Data

The monitored illuminance data used to quantify the long-term daylight provision in the Synagogue were recorded between 26th February 2022 and 2nd April 2024 by logging meters BM1 and BM2. In total, there were 767 full days of measurements where either one or both loggers were recording (equivalent to approximately 2.1 years of data). The rationale for processing the data into metrics that characterises the overall daylight provision in the Synagogue was as follows:

i. All the measured data should be used to avoid bias in the presentation of the results, i.e. no 'cherry-picking' of measurements.

ii. Results should be presented on a monthly basis to reveal how the daylight levels vary across the year.

iii. For each month, the average daily occurrence in hours of key daylight levels should be determined from the measurements.

iv. The key daylight levels used should relate to human visual performance requirements and preferences.

v. Results are normalised to monthly totals, but there should be no interpolation/ estimation of missing data.

The key illuminance levels used to characterise the daylight provision are: 25lx, 50lx, 100lx and 200lx. The minimum key value of 25lx is approximately the lowest illuminance level advised for use in public spaces when lighting needs to be strictly limited, invariably for conservation purposes in museums and art galleries to protect particularly delicate artworks, fabrics, etc. A more typical illuminance level used for all but the most delicate artefacts is 50lx. Daylight illuminance levels around 50 to 100lx are typical in many residential rooms under moderately bright overcast skies. Under daylight illumination levels of 50–100lx, occupants may often be content to read books/ newspapers without additional lighting providing the eye has adapted and there are no contrast issues (e.g. bright window in the field of view). All the same, they might *prefer* illuminances greater than 100lx, particularly if reading for extended periods. Note that the response of the human eye is such that a doubling of brightness is perceived as a significant change, whereas a smaller incremental edition might be difficult to notice. Accordingly, the final illumination level for consideration is set to 200lx.

The likely implications for the occupants of the Synagogue experiencing the various illuminance ranges are summarised as follows:

- Below 25lx many occupants, particularly the elderly, will experience difficulty reading. Those who are not too elderly and with good eyesight may manage to read provided the daylight levels are above 10lx.[2] The Synagogue is likely to appear drab and gloomy.
- Between 25–50lx many of the occupants may be able to read printed paper, provided the text is not too small. The Synagogue is likely to appear dim at the lower end of the range (~25lux), but noticeably brighter at the upper end (~50lux)
- Between 50–100lx most/ all of the occupants are likely to be able to read printed paper without undue discomfort, unless they have marked visual impairment. The Synagogue is likely to begin to appear pleasantly daylit.
- Between 100–200lx there are likely to be few significant improvements in visual performance for the majority of occupants. However, the synagogue is likely to be perceived as having a markedly more pleasant/ daylit appearance.
- Illuminances greater than 200lx probably not needed for the majority of tasks carried out in the Synagogue. However, the additional brightness imparted would be perceived as further 'enlivening' the Synagogue, and therefore welcomed by the occupants.

[2] Young adults with standard vision can generally read fairly well down to illuminance levels in the range 5–10lx. However, as visual acuity declines by roughly a factor of three between the ages of 20 and 60, older people invariably need multiples of these light levels to read, often supplemented by eye correction (glasses etc).

2.3 Daylight Monitoring Results

The illuminance levels in the Synagogue recorded at locations BM1 and BM2 in the period between 26th February 2022 and 2nd April 2024 are presented in both tabular and graphical form. The data were processed to show the average daily occurrence in hours that the four key illuminance levels were achieved (i.e. exceeded) on a monthly basis. A summary of the complete analysis is shown in Table 1. For example, for the month of February, an illuminance of 25lx was achieved (on average) for 5.8 hrs (BM1) and 2.6 hrs (BM2).[3] Whereas an illuminance of 50lx was achieved (on average) for 2.3 hrs (BM1) and 0.3 hrs (BM2).

	BM 1 Hours lux value achieved				BM 2 Hours lux value achieved			
Month	> 25lx	> 50lx	> 100lx	> 200lx	> 25lx	> 50lx	> 100lx	> 200lx
Jan	2.8	0.6	0.0	0.0	1.0	0.0	0.0	0.0
Feb	5.8	2.3	0.9	0.0	2.6	0.3	0.0	0.0
Mar	6.4	3.2	1.4	0.4	4.6	1.7	0.4	0.0
Apr	8.9	6.3	3.1	1.3	7.0	3.7	1.4	0.3
May	10.2	7.4	3.9	1.6	8.8	5.5	2.4	0.5
Jun	10.6	8.2	5.6	2.5	9.3	6.9	3.5	0.7
Jul	10.7	7.9	4.5	1.7	9.1	6.2	2.6	0.6
Aug	9.6	7.2	3.9	1.8	8.3	5.3	2.4	0.7
Sep	8.5	5.4	2.2	0.7	6.8	3.1	1.0	0.1
Oct	6.4	2.7	0.9	0.0	4.1	1.2	0.0	0.0
Nov	3.3	0.8	0.0	0.0	1.3	0.0	0.0	0.0
Dec	1.9	0.2	0.0	0.0	0.7	0.0	0.0	0.0

Table 1: Average daily hours key illuminance values achieved on a monthly basis

The data in Table 1 are presented graphically in Figure 3. Two bars are shown for each month, the left hand is data from BM1 and the right from BM2. Colour coding is employed to show the number of hours achieved for the four threshold light levels (25, 50, 100 and 200lx). Note the 'bars' are superposed rather than stacked – see illustration in Figure 2. For example, in July, 25lx is achieved (on average) for 10.7hrs (BM1) and 9.1hrs (BM2). Whereas 200lx is achieved for 1.7hrs (BM1) and 0.6hrs (BM2).

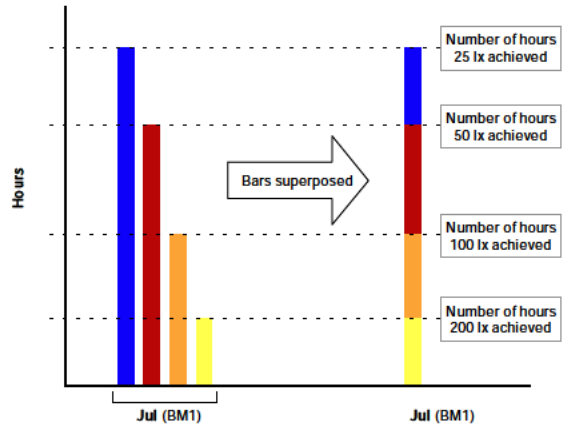


Figure 2: Illustration showing superposition of bars in Figure 3

[3] Decimal hours are shown, e.g. 1.5hrs equals 1hr 30mins.

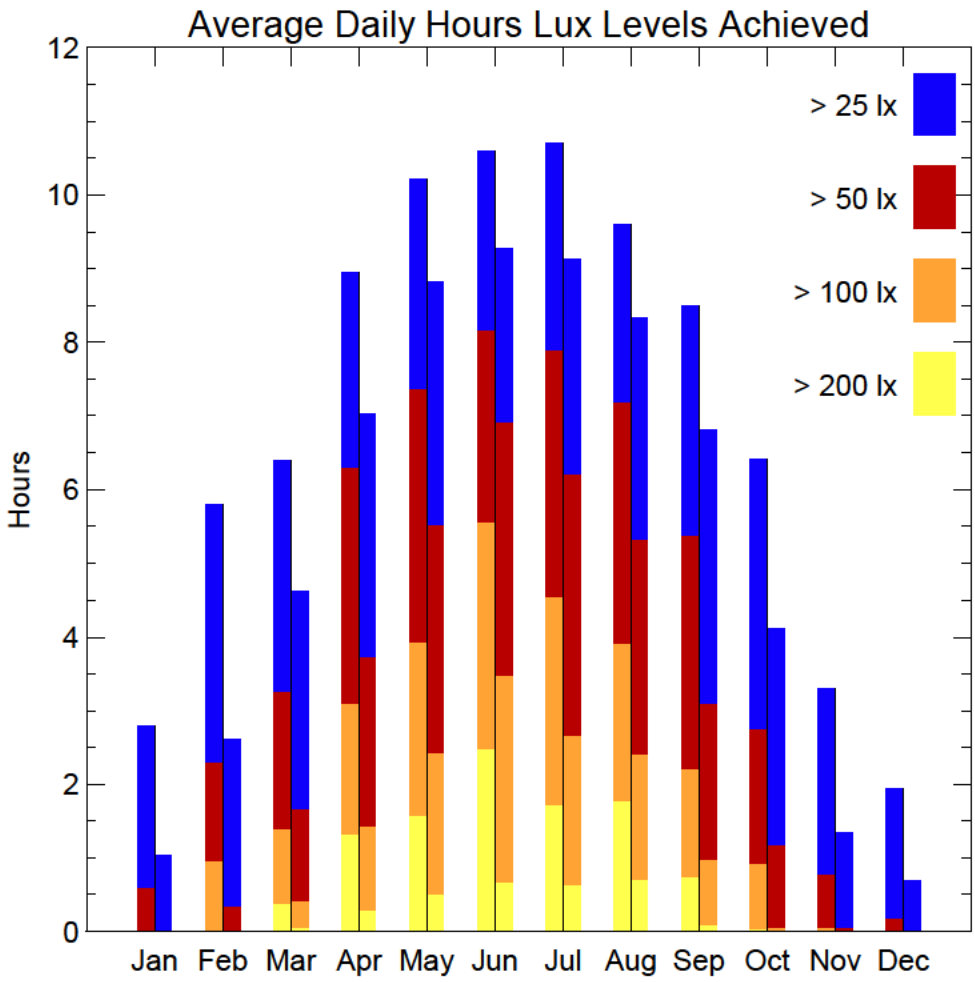


Figure 3: Typical daily hours lux levels achieved. Monitoring period 26th February 2022 to 2nd April 2024

2.4 The Importance of Reflected Sunlight

It was revealing to compare the measured internal illuminance values with simultaneous data for the sun and sky conditions at the same location. The external condition data used were global horizontal irradiation, diffuse horizontal irradiation and beam normal irradiation at 15 minute intervals for the entire monitoring period to date. The global and diffuse horizontal irradiation data were sourced from the Copernicus Atmosphere Monitoring Service (CAMS). This service provides freely available satellite-derived radiation data covering Europe, Africa, the Middle East and parts of South America at various time resolutions. The period of record is February 2004 to the present day (with up to two days delay). CAMS satellite irradiation data has undergone numerous validation studies and shown to be a reliable indicator of conditions on the ground.[4,5]

CAMS irradiation data for the precise latitude/ longitude coordinates of the Synagogue were

[4] German Salazar et al. "Solar irradiance time series derived from high-quality measurements, satellite-based models, and reanalyses at a near-equatorial site in Brazil". In: *Renewable and Sustainable Energy Reviews* 117 (2020), p. 109478.

[5] Laurent Vuilleumier et al. "Accuracy of satellite-derived solar direct irradiance in Southern Spain and Switzerland". In: *International Journal of Remote Sensing* 41.22 (2020), pp. 8808–8838.

downloaded from the Solar Radiation And Meteorological Data Services website.[6] The CAMS irradiation data for the duration of the monitoring period (26th February 2022 to 2nd April 2024) were converted to illuminance values using the Perez luminous efficacy models. Global horizontal illuminance (GHI) is a measure of the total light from the sun and sky received by an (unobstructed) horizontal surface. Diffuse horizontal illuminance (DHI) is the same as global horizontal illuminance but excluding the contribution of solar radiation. When the two quantities are plotted, the amount by which GHI is greater than DHI indicates the degree of sunniness. A bell-shaped curve for GHI indicates largely clear sky conditions throughout the day. If however the lines of GHI and DHI overlap (i.e. when GHI equals DHI), this indicates that the sky at that time was largely overcast with no significant solar contribution, i.e. GHI ≃ DHI. The beam normal illuminance (BNI) is a measure of the direct sun intensity measured normal to the direction of the sun. The BNI can often exceed GHI on clear days at times when the sun altitude is low – and thus its contribution to horizontal illuminance is small compared to its intensity measured normal to the beam.

Our use of the CAMS-derived illuminance data is illustrative. However, examination of the correspondence between the internal daylight levels and the (external) illumination levels confirmed our hypothesis that reflected sunlight makes a significant contribution to the daylight inside the Synagogue. And also that the effect is important throughout the year. An example plot of the data collected on 8th May 2022 is used to illustrate the substantial contribution of reflected sunlight to the internal daylight levels in the synagogue, Figure 4. The red and the blue lines show the illuminance measured at points BM1 and BM2, respectively, at 5 minute intervals. The time axis shows GMT.

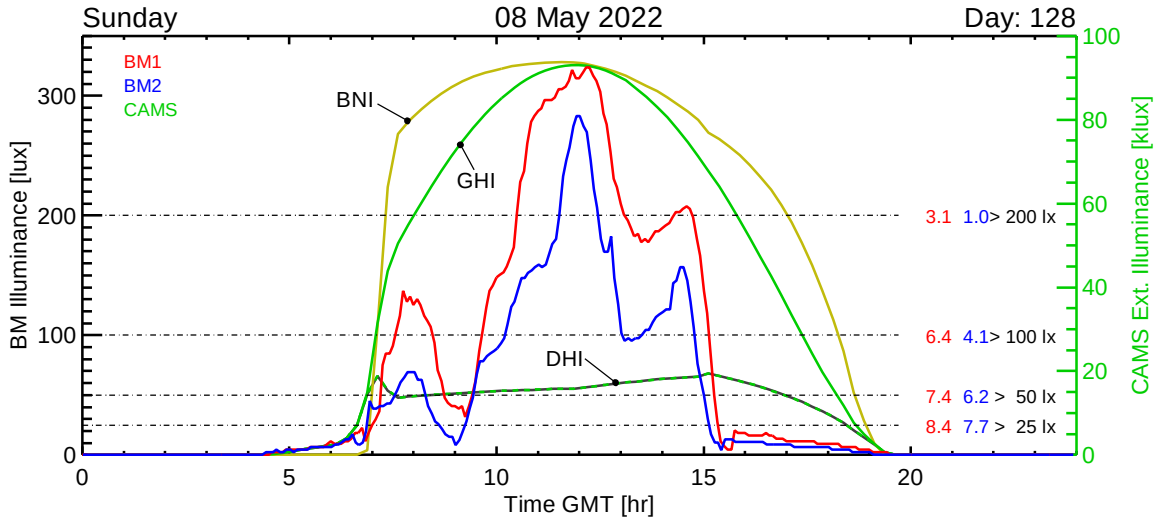


Figure 4: Example data plot for 8th May 2022. The external sun and sky conditions-derived from satellite data-are indicated by the green and yellow lines. The solid green line shows the global horizontal illuminance (GHI), and the dashed green/grey line shows the diffuse horizontal illuminance (DHI). The yellow line shows the beam normal illuminance (BNI).

For this bright day, the maximum recorded illuminances were ~320lux (BM 1) and ~280lux (BM 2), at the same time around 12:00. The key illuminance values are indicated by horizontal dashed lines. The CAM S-derived external illumination data is over-plotted using the same time axis, however the scale used is now the right-hand y-axis in green, with units of klux, i.e. thousands of lux. For this day, The peak GHI (and, coincidently, peak BNI) were both ~95klux (i.e. ~95,000lux) around noon. W hereas DHI (the illuminance from the sky only on

[6] https://www.tsv.soda-pro.com

thehorizontal) was ~20,000lux. Thedata showsthat thiswasa largely clear, sunny day with just a small degree of cloud around dawn (07:00). All 767 daily plots of illuminance measurements in the Synagogue showing also the satellite-derived external illuminance conditions are presented in Appendix B of the report.[7]

A conspicuous feature evident on many of the sunny days (see Appendix B) is a large dip in both internal light level readings around 08:30 to 10:00, followed by another rise. This distinct dip is quite broad (lasting approximately two hours) and does not result from reduced external irradiation – GHI is steadily increasing until around noon. Instead, it is evident that this feature results from the progression of the path of the sun and its interaction with the surrounding buildings. It appears that, on this day from around 06:00 and until 08:00, the Synagogue receives reflected sunlight from the surrounding buildings. Then, between 08:30 and 09:30, the reflected sunlight decreases to a minimum because the sun is being blocked by a nearby surrounding building – One Creechurch Place (~80m tall from ground level). Thereafter, when the sun has progressed past the obstructing building, the reflected sunlight increases as rapidly in the next hour as it declined in the previous hour. Such a persistent feature cannot be explained by random variations such as cloud patterns, etc.

This assertion is confirmed by examining the internal illuminance plot (Figure 4) alongside simulated time-lapse images for that day which show the progression of sunlight and shadow around the immediate vicinity of the Synagogue. The illustration given in Figure 5 shows renderings of the shadow patterns for the hours 08:00, 09:00 and 10:00.[8] These renderings reveal the important contribution of reflected light from the immediate surroundings to the daylight levels in the Synagogue. At 08:00 the shadow cast by One Creechurch Place has begun to encroach on the Synagogue courtyard, and the measured daylight levels begin to decline steeply. At around 09:00 the shadow cast by One Creechurch Place results in the maximum reduction in daylight levels recorded at both locations in the Synagogue: below 50lux for BM1 and below 25lux for BM2. At 10:00 the shadow cast by One Creechurch Place begins to recede from the courtyard, and the illuminance levels measured in the Synagogue begin to rise steeply, eventually attaining values around 300lux each.

The example above showing the overshadowing effect of One Creechurch Place on daylight levels in the Synagogue can be used to illustrate the likely effect that (proposed building) 31 Bury Street would have on Synagogue daylight levels on a similarly clear day during the middle of the year. The illustration is shown in Figure 6 using the same presentation to that employed for One Creechurch Place. For 31 Bury Street, its shadow would begin to encroach on the Synagogue courtyard area around 11:00, and between 12:00–13:00 the courtyard area is heavily shaded. By 14:00 the shadow from 31 Bury Street has largely receded from the Synagogue courtyard area. The illuminance plot used previously is repeated, but now the likely effect on the measured daylight levels at BM1 and BM2 (caused by 31 Bury Street) has been illustrated by superposing on the BM1/ BM2 lines 'best guess' estimates indicating how they might change – magenta curve for BM1, cyan curve for BM2. The *actual* degree of light reduction could be less or greater than that shown – but, given the similarities with the example of One Creechurch Place, it is likely to be of that order. The same data for BM1 and BM2 are shown disaggregated (with the less significant details removed) in Figures 7 and 8, respectively.

The contribution of reflected sunlight might appear to be a subtle aspect of the daylight dynamics in the Synagogue. However, it is revealing of a wider reality that the *prevailing* (i.e. yearly) daylight in Bevis Marks depends overwhelmingly on reflected sunlight and skylight from nearby building surfaces. Consequently, any reduction of the daylight provision in the Synagogue that might result from additional overshadowing can therefore only be assessed using a computer simulation technique that accounts adequately for reflected sunlight and skylight.

[7] Note, two versions of the report have been prepared: with and without the 64 pages containing the 767 daily plots.

[8] The shadow pattern images were generated using the VuCity software and supplied with permission for use by HGH Consulting.

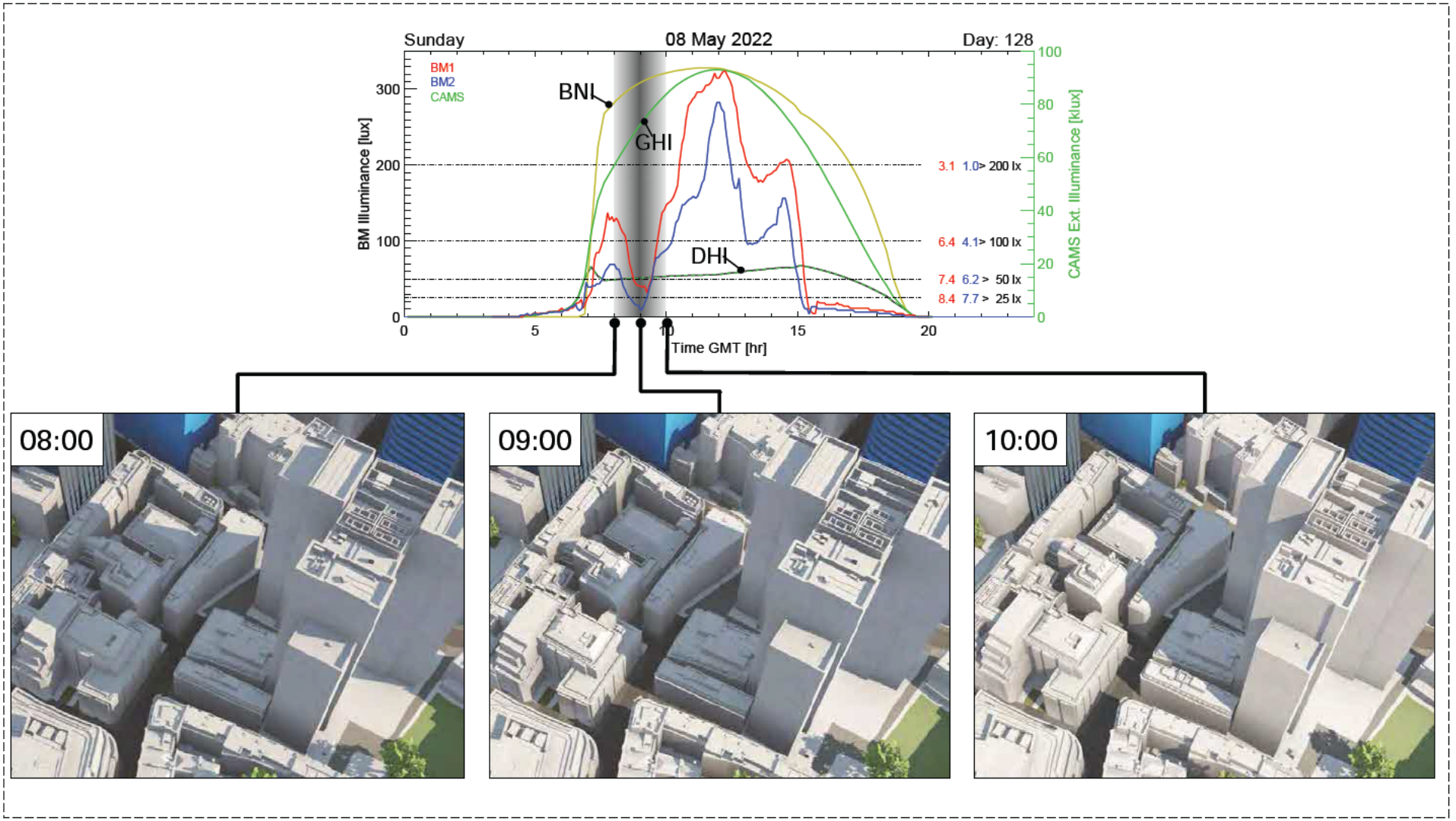


Figure 5: Renderings showing the progression of shadow cast by One Creechurch Place on Bevis Marks for a clear sky day (8th May) between the hours 08:00 and 10:00 (GMT). The significant effect of the overshadowing on measured Bevis Marks illuminance levels is readily apparant.

Cannon-Brookes Lighting & Design
Daylight-Experts.com

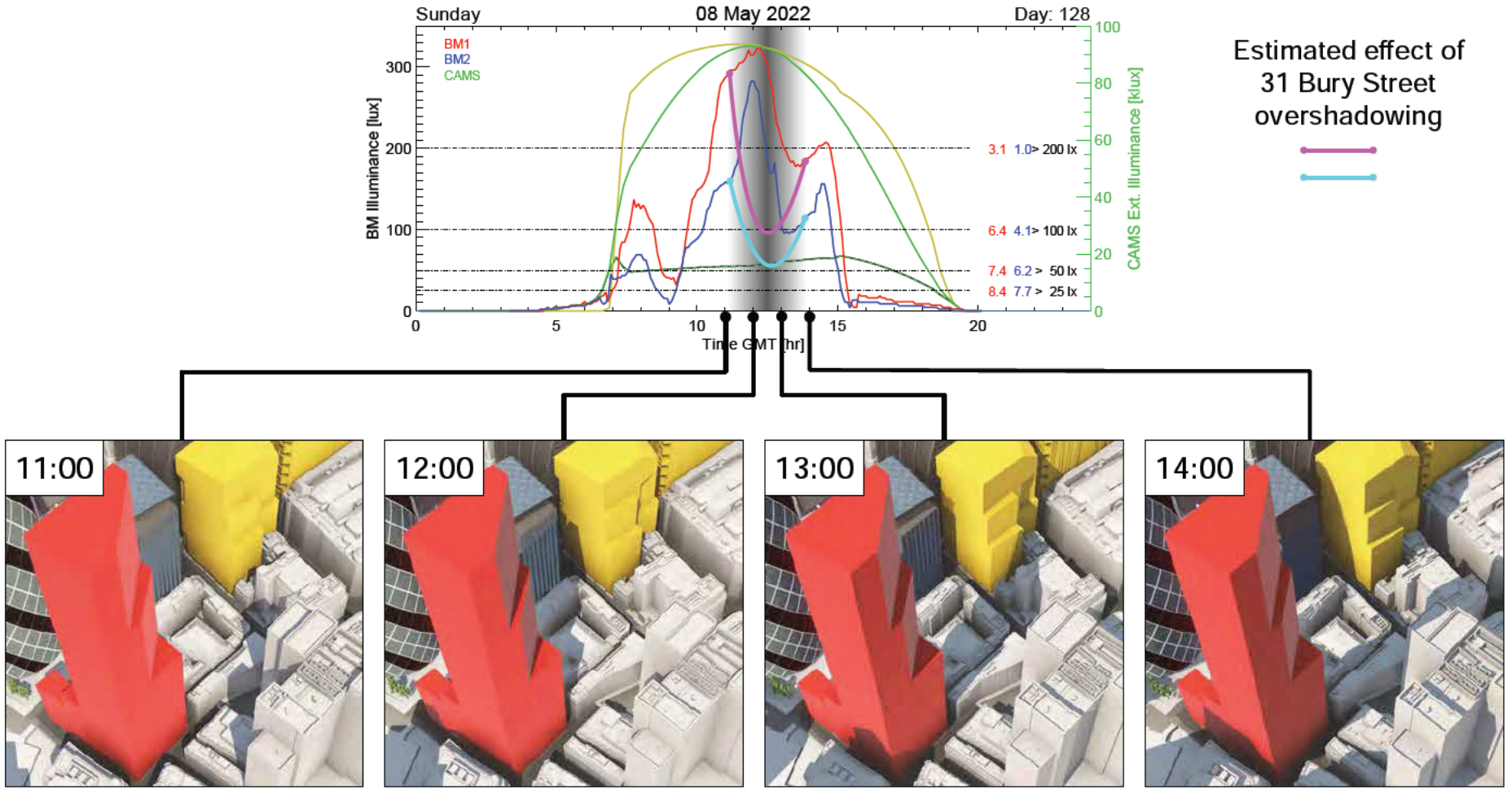


Figure 6: Renderings showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT), and estimated likely reduction in measured Bevis Marks daylight levels caused by the overshadowing on such a day.

Cannon-Brookes Lighting & Design
Daylight-Experts.com

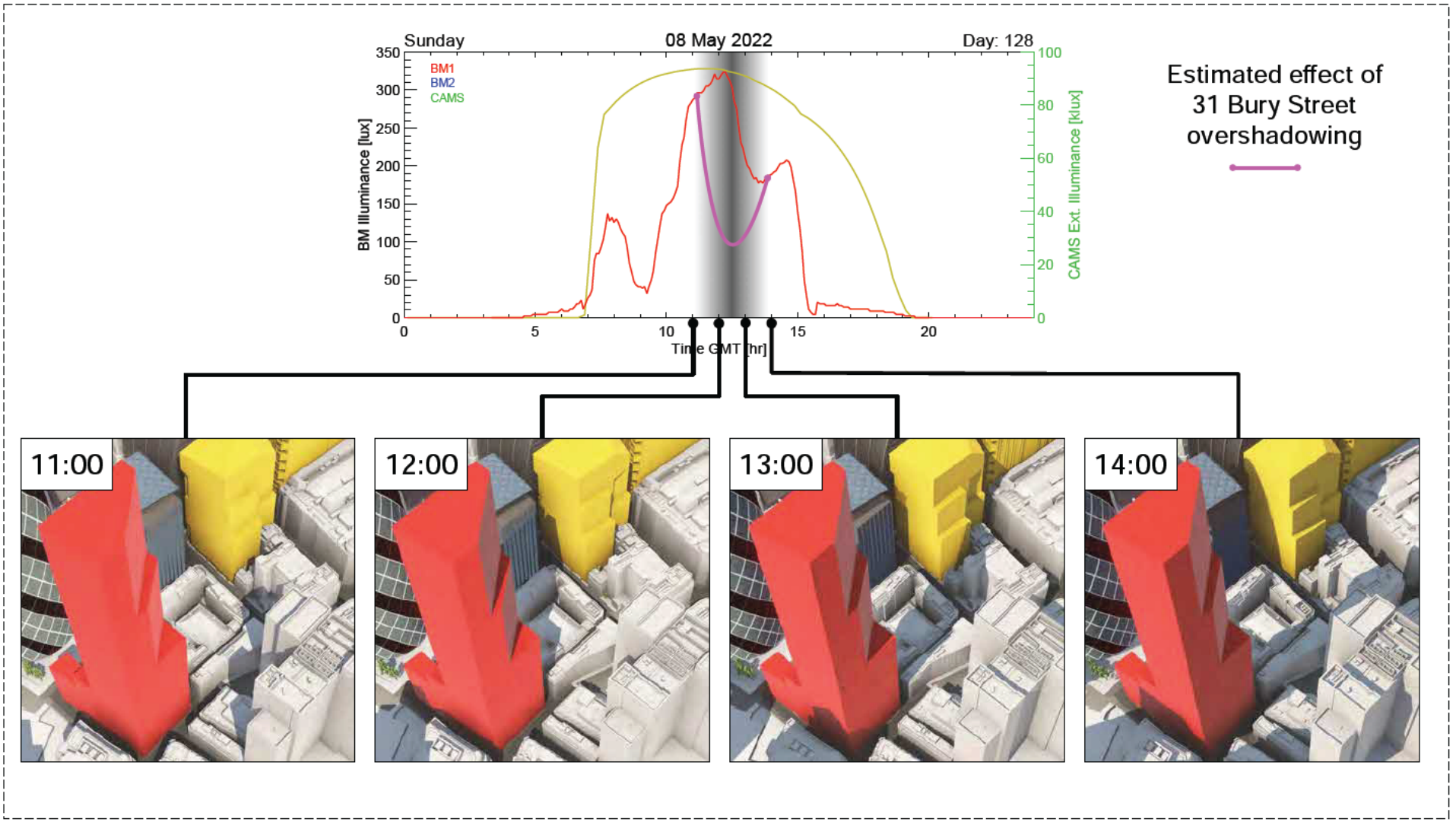


Figure 7: Data from Figure 6 focussing on illuminance at BM1. Renderings as before showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT).

Cannon-Brookes Lighting & Design
Daylight-Experts.com

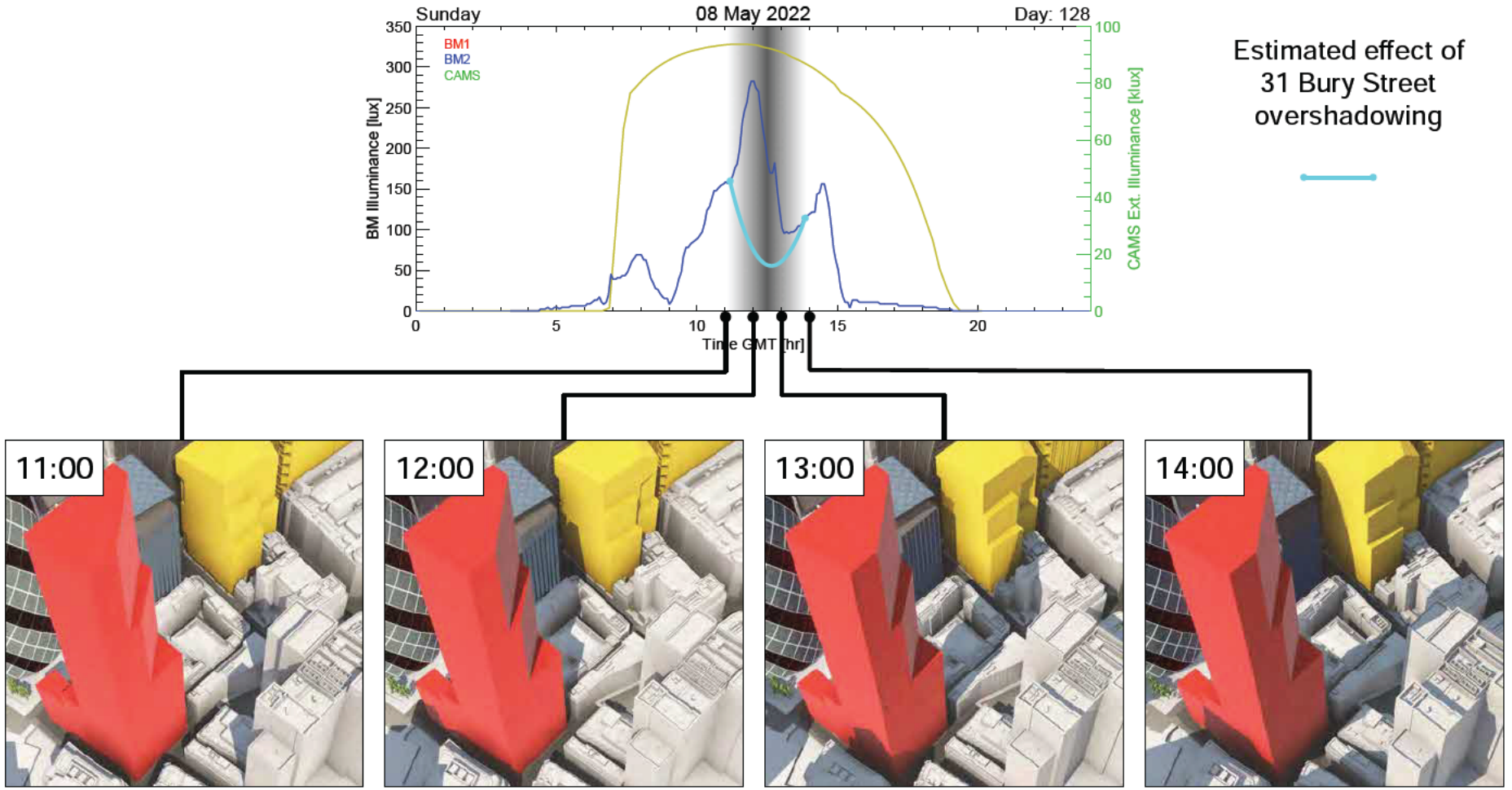


Figure 8: Data from Figure 6 focussing on illuminance at BM2. Renderings as before showing the progression of shadow cast by 31 Bury Street (red tower) on Bevis Marks for a clear sky day (8th May) between the hours 11:00 and 14:00 (GMT).

Cannon-Brookes Lighting & Design
Daylight-Experts.com

3 Predicting Daylight Levels in Bevis Marks

As noted in the Executive Summary, the reduction in daylight provision to the Synagogue caused by any proposed development(s) can only be estimated using a realistic prediction method which minimises uncertainty in the outcome. In other words, the prediction method used must be able to faithfully model the prevailing nature of the daylight levels experienced by the occupants of the synagogue – and as proven by direct measurement.

Commonly used prediction methods employed by surveyors at the planning stage do not model actual daylight levels, i.e. illuminance lux levels. Instead, they model various proxies of daylight provision under enormously simplified conditions. For example, a single unchanging sky condition (uniform or standard overcast brightness pattern) with no contribution from sunlight. These methods do not predict absolute levels of illuminance (e.g. as measured in the Synagogue), instead they predict percentage ratios. The basis and intrinsic limitations of these methods are described in Appendix A.

3.1 Climate-Based Daylight Modelling

In the mid to late 1990s, Mardaljevic developed and validated a daylight simulation approach that would later become known as Climate-Based Daylight Modelling, or CBDM.[9,10] The CBDM 'engine' developed by Mardaljevic was founded on the *Radiance* Lighting Simulation System.[11] Although lacking a formal definition, CBDM is widely taken to be the prediction of any luminous quantity (illuminance and/ or luminance) using realistic sun and sky conditions derived from standardised climate data, i.e. hourly annual weather files. Thus, CBDM predicts annual profiles of absolute quantities, such as illuminance, which are directly comparable to what can be measured in buildings. For example, with a suitably detailed 3D model, it would be possible to predict daylight levels at points in the Synagogue, and then process the annual simulation data to produce plots of daylight provision similar/ identical to that shown in Figure 3.

The widespread adoption of the *Radiance* lighting simulation system[12] and, ultimately, CBDM was due in part to the outcomes from validation studies which demonstrated quite remarkable prediction accuracy, e.g. within ±10% of measured values.[13] Around this time, the accuracy of physical scale models for daylight assessment was called into question, with validation studies showing large discrepancies between illuminances measured in a scale model and the full-size building under the same conditions.[14] CBDM as a tool for practical application steadily gained traction during the first decade of the millennium. Landmark projects such as daylighting the New York Times Building[15] and the Central Park Tower daylight injury evaluation[16] (also in New York) helped to demonstrate the potential of this powerful new technique.

In 2013 the UK Education Funding Agency (EFA) made CBDM a mandatory requirement for the evaluation of designs submitted for the Priority Schools Building Programme (PSBP). School designs submitted to the PSBP must achieve certain 'target' criteria for the useful daylight illuminance metric. This was believed to be the first major upgrade to mandatory daylight

[9] J. Mardaljevic. "Simulation of annual daylighting profiles for internal illuminance". In: *Lighting Research and Technology* 32.3(2000),pp.111–118.

[10] Working independently and a little later, Christoph Reinhart also developed a similar technique, but with a different formulation and, arguably, less rigorously validated.

[11] G.W ard Larson et al. *Rendering with Radiance: The Art and Science of Lighting Visualization*. San Francisco: M organ Kaufmann, 1998.

[12] Ibid.

[13] J. Mardaljevic. "The BRE-IDMP dataset: a new benchmark for the validation of illuminance prediction techniques". In: *Lighting Research and Technology* 33.2(2001),pp.117–134.

[14] S. W. A. Cannon-Brookes. "Simple scale models for daylighting design: Analysis of sources of error in illuminance prediction". In: *Lighting Research and Technology* 29.3(Sept.1997),pp.135–142.

[15] J.M ardaljevic, L.Heschong, and E.Lee. "Daylight metrics and energy savings". In: *Lighting Research and Technology* 41.3(2009),pp.261–283.

[16] J. Mardaljevic, G. M. Janes, and M. Kwartler. "The 'Nordstrom Tower': A landmark daylight injury study". In: *CIE 28th Session, Manchester, UK* (2015).

requirements since the introduction of the daylight factor more than half a century ago. In the US, a climate-based daylight metric approved by the IESNA has appeared in the latest version of LEED. The 2018 European Standard for Daylight in Buildings (EN 17037) is the first major standard where the basis for daylight assessment is founded on the annual occurrence of absolute measures of illuminance.[17] This marked a step-change from the traditional daylight factor approach. To assess the daylighting performance of a building design against EN 17037 criteria, the evaluated spaces are rated in terms of the spatial extent and the (CBDM predicted) degree of occurrence of target illuminance values as a fraction of the daylit year.

3.2 Outline CBDM Evaluation of Bevis Marks

In September 2021 we carried out climate-based daylight modelling (CBDM) simulations of an approximate scenario based on the Synagogue and its current surroundings. A 3D model of the Synagogue was created based on detailed drawings, and the nearby buildings estimated to create a simple 'massing' model for the surroundings. The 3D model therefore should be considered to be an approximation until a 3D laser scan of the Synagogue is carried out and a detailed massing model acquired. Accordingly, the CBDM results generated using this 3D model should be considered as illustrative until more accurate building geometry is available. Nevertheless, we believe the 3D model is sufficient to reveal 'broad brush' characteristics of the daylight illumination in the Synagogue. More importantly, the findings support our assertion that the methods commonly used to assess daylight provision in buildings – both for rights of light and planning – are not applicable for the particular case of Bevis Marks because they cannot adequately reveal the *actual* degree of daylight loss resulting from the proposed developments. The rationale for our assertion – given below – necessitates an appreciation of the distinction between directly received light (from the sun or sky) and indirectly received light, i.e. that which arrives from the sun or sky following multiple reflections.

The quantity referred to here as the total annual illumination (TAI) is a measure of all the daylight illumination received at a point in a building for a period of a full year. It is a useful summary metric since it reveals the totality of daylight illumination – from the sun and sky – over a representative period of a full year. Total annual illumination is one of the many metrics that can be predicted using CBDM to indicate the daylighting performance of a space. The CBDM formulation used here is a research-grade daylight simulation tool developed by Mardaljevic and known as the 4 Component Method (4CM). This tool is widely regarded to be the most rigorously validated of all daylight simulation tools, and so serves as a benchmark to assess the accuracy of other CBDM formulations. The 4 Component Method is called so because it predicts, at a point in a space, the total daylight in terms of its four components:

i. Direct sun – light that arrives directly from the sun (usually through a window).
ii. Indirect sun – light from the sun that arrives following one or more reflections, usually from both external (e.g. surrounding buildings, ground, etc.) and internal surfaces (e.g. walls, ceilings, etc.).
iii. Direct sky – light that arrives directly from the sky (usually through a window).
iv. Indirect sky – light from the sky that arrives following one or more reflections, usually from both external (e.g. surrounding buildings, ground, etc.) and internal surfaces (e.g. walls, ceilings, etc.).

Analysing the CBDM predictions for TAI in terms of the four components can, depending on the scenario, greatly enhance the understanding the importance of the various light transfer mechanisms, and how they contribute to the light experienced by the occupants of a building.

The TAI predictions for the core of the Synagogue revealed that around ~1% of the daylight received over a full year was that arriving directly from the sky, no direct sunlight at all was received. Thus, ~99% of the daylight illuminating the core of the synagogue is light from the sun

[17] European Committee for Standardization. *EN 17037:2018 - Daylight in Buildings*.2018.

and the sky reflected off adjacent buildings. Of the reflected light illuminating the core of the Synagogue, about 3/5 iscomprised of reflected skylight and theremaining 2/5 by reflected sunlight. We would expect a fully detailed 3D model to give some variation in the relative amounts of the illumination components. However, even if the total of the direct components were predicted to be several times greater, say, 5%, it would not alter the key finding that daylight illumination is dominated by *reflected* light – originating from the sun and the sky in roughly equal proportions. Note, walking around the core of the Synagogue, at best only tiny slivers of sky are directly visible through the windows. Thus, the potential for direct illumination by skylight is very small indeed, and for direct sunlight it must be negligible/ zero. And since the estimated massing model of the surroundings was partial, it is not improbable that the direct components of total daylight in the core of the Synagogue could amount to even less than the ~1% predicted by the illustrative model.

4 Conclusions

4.1 Daylight Measurement

The following assertions can be made from the daylight monitoring evidence collected between 26th February2022and2nd April 2024:

a) The measured daylight levels support the claim made by the users of the Synagogue that it is experienced as functionally daylit space for the majority of the months of the year.

b) The daylight levels during the winter months, however, are often only barely exceeding the threshold needed to perform visual tasks, e.g. reading, appreciation of the space, etc.

c) The measured data supports our observations from site visits that daylight in the core of the Synagogue is comprised almost entirely of reflected light. Reflected sunlight makes a significant contribution to the prevailing daylight levels in the Synagogue, even on partially sunny days which occur much more often than entirely clear-sky days.

It is reasonable therefore to describe the prevailing daylight provision in the Synagogue at present as being at or very close to a 'tipping point'. Consequently, any additional reduction in daylight provision caused by the proposed developments carries the significant risk that the prevailing daylight levels inside the Synagogue could be pushed beyond this 'tipping point', with the Synagogue ceasing to be a *functionally daylit* space.W erethattohappen,itcouldprofoundlyaffect thecharacter,perception and useofthespace–bringingintoquestion thecontinued survival oftheonly Synagoguein Europetohaveheld regularservicescontinuously formorethan 300 years.

4.2 Daylight Prediction

Theevidencecollected during themonitoring campaign clearly demonstratesthat theonly way to reliably predict the daylight loss due to proposed developments is to use Climate Based Daylight Modelling (CBDM). In contrast to the traditionally used methods (see Appendix A), CBDM has the potential to reliably predict the totality of daylight illumination – including the important reflected sun and sky contributions – over representative periods of at least a full year.

Statement of Compliance and Declaration

The authors of this report have prepared it in compliance with norms expected for an expert witness, including possible use of the material in court:

I. We confirm that our report includes all facts which we regard as being relevant to the opinions which we have expressed, and that attention has been drawn to any matter which would affect the validity of those opinions.

II. We confirm that our duty to the Court (should it become a legal matter) as expert witness overrides any duty to those instructing or paying us, that we have understood this duty and complied with it in giving my evidence impartially and objectively, and that we will continue to comply with that duty as required.

III. We confirm that we are not instructed under any conditional fee arrangement.

IV. We confirm that we have no conflicts of interest of any kind other than those already disclosed in my report.

V. We confirm that our report complies with the expected norms for academic practice with regard to acting as Expert Witness.

VI. We confirm that, insofar as the facts stated in our report are within our knowledge, we have made clear which they are and we believe them to be true, and that the opinions we have expressed represent our true and complete professional opinion.

VII. We aware of the requirements of CPR Part 35, practice direction 35 and the Guidance for the Instruction of Experts in Civil Claims 2014.





Prof. John Mardaljevic

Dr. Stephen Cannon-Brookes

24th October 2024

Appendix

A Critique of the Waldram and Daylight Factor Methods

The following contains material from two peer reviewed articles:

- P Tregenza and J Mardaljevic. "Daylighting buildings: Standards and the needs of the designer". In: *Lighting Research & Technology* 50.1(2018),pp.63–79
- J.M ardaljevicand J.Christoffersen."'Climateconnectivity'in thedaylightfactorbasis ofbuildingstandards".In: *Building and Environment* 113(2017),pp.200–209

A.1 Waldram, Trotter and the daylight factor

Quantitative measures of daylighting provision evolved from the methods devised in the 19th century to determine some objective basis for the degree of daylight injury (that is, reduced daylight illumination) caused to an existing space by the introduction of some obstruction, e.g. a new building. The Prescription Act 1832 provides for the creation of a right to light where light has been enjoyed for the period of 20 years before a claim to the easement is made.[18] Once a right to light (with regard to a particular window) is determined to exist, the owner of the right is entitled to *"sufficient light according to the ordinary notions of mankind"*. Whilstthe1832 Actessentiallyenshrined in Common Law thenotion ofa'righttolight',thedetermination of whatconstitutesan *"ordinary notion"* of sufficiency was, initially, largely a matter of judgement supplemented by rough rules of thumb such as the 45° rule, i.e. the vertical angle of sky visible at the centre of the window. The attempts to systematise the assessment of daylight injury date back to at least 1865.[19]

In the 1920s, Percy Waldram determined what was intended to be a precise and objective measure of an *"ordinary notion"* of sufficiency for daylight illumination. This was based on measurements of daylight illumination in buildings combined with subjective determination of sufficiency by a jury of experts. From this study, Waldram determined the so-called "grumble point", i.e. the point in a space at the boundary between sufficient and insufficient daylight from a window. The "grumble point" was defined in terms of the illumination received at that boundary as a percentage of the unobstructed horizontal illumination from a notional average (assumed uniform luminance) sky. The percentage value at the "grumble point" was determined by Waldram's jury to be 0.2%. For practical application of Waldram's "grumble point" in 'rights of light' disputes, surveyorscommonly apply the"50/ 50 rule" to determineif a spaceisadequately daylit, i.e. no more than half of the space at table-top height should receive less than 0.2% of the sky illumination. Additionally, the percentage value is referred to as the sky factor since, for evaluation purposes, it is a measure of the illumination on a horizontal surface resulting from any direct view of a uniform luminance sky, expressed as a percentage of the horizontal illumination from an unobstructed view of the sky. Neither reflected light nor attenuation from any glazing are accounted for in the 'rights to light' schema.

Whilst Waldram's work is widely credited as providing the basis for the daylight factor, it appears that the idea of using a ratio between inside and outside was first proposed in 1895 by Alexander Pelham Trotter (1857–1947).[20] Theoriginsofthedaylightfactor(DF)areactually somewhathazy sincetheredoesnotappeartohavebeen aseminalpaperintroducingtheap-proach.Thereferencetoitsintroductionin1895appearstobeanecdotalandrecalledanumber ofyearslater.Thedaylightfactorwasconceived asameansofratingdaylightingperformance

[18] ThePrescriptionAct1832."(Regnal.2and3W ill4)".In: *The Stationery Office, London* (1832).

[19] R.M. Kerr. *On Ancient Lights: And the Evidence of Surveyors Thereon : with Tables for the Measurement of Obstructions*.J.M urray,London,1865.

[20] J. A. Love. "The evolution of performance indicators for the evaluation of daylighting systems". In: *Industry Applications Society Annual Meeting, 1992., Conference Record of the 1992 IEEE* (1992), 1830–1836 vol.2.

independently of the actually occurring, instantaneous sky conditions. Hence the daylight factor DF was defined as the ratio of the internal horizontal illuminance E_{in} to the unobstructed (external) horizontal illuminance E_{out}, usually expressed as a percentage:

$$DF = \frac{E_{in}}{E_{out}} 100\% \quad (1)$$

However, the external conditions still need to be defined since the luminance distribution of the sky will influence the value of the ratio. At the time that the daylight factor was first proposed it was assumed that heavily overcast skies exhibited only moderate variation in brightness across the sky dome, and so they could be considered to be of constant (that is, uniform) luminance. The assumption of a uniform sky is, of course, in keeping with the notion of rating the performance independently of sky conditions. In the second half of the 20th Century the daylight factor formulation switched from using the uniform sky to the CIE Standard Overcast Sky.

A.2 Absolute and relative values of illumination

In a 1937 paper P. J. Waldram claimed that: *"The eye is affected by ratio only, and is scarcely aware of huge variations in amount."*.[21] The evidence for this was based on an assessment of the daylight adequacy of 20 spaces carried on both a "bright day" and a "dull day" by a 'jury' of six members (i.e. the data used previously to determine the "grumble point"). Waldram's claim appears to have become the foundation for what is now an 'article of faith' amongst a number of practitioners, i.e. that there is no need to make any consideration of absolute values – the daylight factor ratio is all that is required. Waldram's assertion and the evidence in support of it were examined in a 1955 CIE paper by R. O. Phillips.[22] Phillips notes that:

> *If this investigation did, in fact, support the view that the daylight factor is more important than the actual illumination in determining the adequacy of the lighting, then the values of the daylight factor determined would be substantially the same on both types of day. If on the other hand, it is the illumination which is the more important, a higher value of the daylight factor would be required on a dull day that on a bright one.*

The original report of the 'jury' findings presented by Waldram included the curve shown in Figure A1. This was intended to "*summarise the results concisely and to deduce a figure of daylight factor which may fairly be said to represent the average opinion of the observers*".[23] Phillips decomposes this curve into the data taken on the bright and dull days respectively. They clearly show different distributions, with a marked preference for a higher daylight factor value on a dull day compared to a bright one: the means were 0.20% (dull day) and 0.09% (bright day). Applying a paired *t*-test on the data, Phillips notes that: "*Since such a value could only arise by chance once in several millions of cases, the hypothesis that there is no difference must logically be rejected*". In short, Phillips' analysis of the data makes the convincing case that, contrary to Waldram's assertion, the subjects were in fact expressing a preference for adequate absolute daylight levels rather than relative ones (i.e. daylight factors).

Phillips' paper is potentially of great significance since it offers a robust challenge to a rarely unquestioned assertion that has long been held as a fundamental tenet of daylighting design/ evaluation. That is being so, a question presents itself: why has this paper been consigned to near-obscurity? This finding from the Phillip's paper is included here because Waldram's assertion has been so influential that it has framed much of the development of methodologies for the evaluation and testing of daylight performance in spaces. In particular for the case of

[21] P. J. Waldram. "Measuring and predetermining daylight illumination". In: *The Builder* (1937), p. 598.

[22] R. O. Phillips. "An historical outline of the concepts and terminology of daylight". In: *Proc. CIE v2, Zurich, Switzerland* (1955).

[23] Ibid.

Bevis Marks, the preference for *higher* levels of absolute illumination (say, 100lx rather than 25lx) would appear to be in accord with what was *actually* determined by Waldram's 'jury'.

It needs to be recalled that, at the time that Waldram's jury carried the assessments, notions of illumination adequacy were very different from what they are today. However, that consideration does not alter the significance of Phillips' re-evaluation of the Waldram study. This and related studies by Waldram also serve as the basis for the "rights to light" schema devised for the determination of daylight injury. In recent years the methodology employed by Waldram has been severely critiqued in a number of papers.[24,25,26,27]

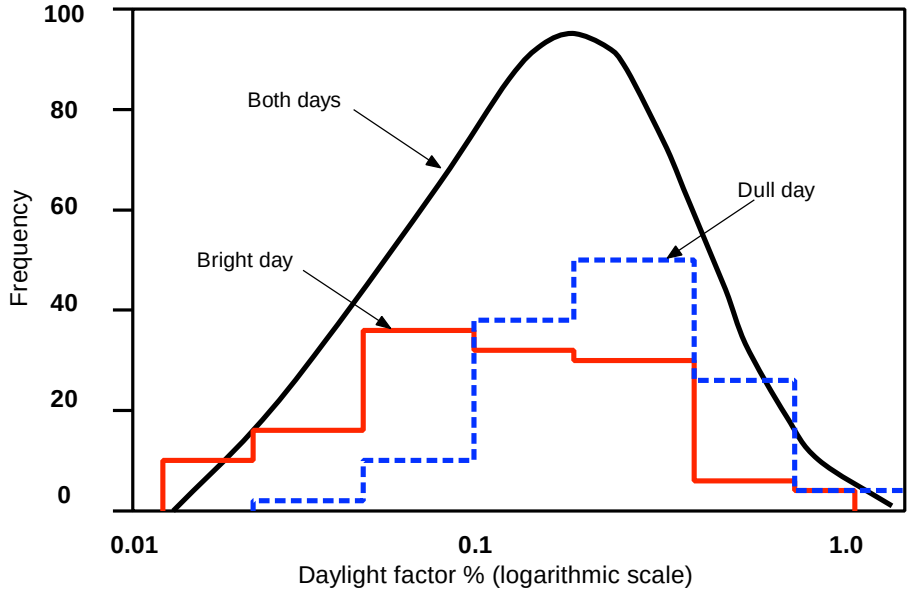


Figure A1: Distribution of preferred daylight factor values (after Phillips R. O. Phillips. "An historical outline of the concepts and terminology of daylight". In: *Proc. CIE v2, Zurich, Switzerland* (1955))

B Daily Plots of Illuminance Data

DESCRIPTION ONLY – SEE COMPLETE REPORT FOR THE DAILY PLOTS

Appendix B presents all 767 complete days of monitoring data recorded between 26th February 2022 and 2nd April 2024 by logging meters BM1 and BM2. Data are presented where there is a complete day for either one or both of the meters. For the first period of monitoring, 26th February 2022 to 7th June 2022, the contribution of electric lighting used by contractors during maintenance work was subtracted from the values recorded by BM1 and BM2. For the remaining period, it can be seen that a number of days show the small contribution (~10lux) of electric lighting at various times. This will have a small effect (i.e. slight 'uplift') on the results presented in Section 2.

As described in Section 2.4, the plots also contain illustrative external illuminance conditions (GHI, DHI and BNI) derived from satellite remote sensing.

[24] P. Chynoweth. "Progressing the rights to light debate – Part 1: a review of current practice". In: *Structural Survey* 22.3(2004),pp.131–137.

[25] P. Chynoweth. "Progressing the rights to light debate: Part 2: the grumble point revisited". In: *Structural Survey* 23.4(2005),pp.251–264.

[26] Paul Chynoweth. "Progressing the rights to light debate: Part 3: judicial attitudes to current practice". In: *Structural Survey* 27.1(2009),pp.7–19.

[27] P. Defoe and I. Frame. "W as W aldram wrong?" In: *Structural Survey* 25.2(2007),pp.98–116.

Appendix 2 - Response to GIA Lunar Study

the S&P HARDI community Bevis Marks





Planning application ref. 24/00021/FULEIA; proposed 43 storey tower at 31 Bury Street

Response to the Lunar Transit Study and Additional Information produced by GIA

14 November 2024

Rabbi Shalom Morris

Rabbi, Bevis Marks Synagogue

PhD Candidate, King's College London, Dept of History

Introduction

This note sets out the findings of a review of the ‘Lunar Transit Study’ and ‘Additional Information’ produced by GIA (12 Sept and 17 Oct respectively). It is beyond the scope of this report to consider the validity of the data provided by GIA. However we reserve the right to later interrogate this data in more detail, should this be necessary.

Our review of the data provided found that significant harm will come to the Bevis Marks Synagogue should the planning application be approved.

GIA’s report attempts to demonstrate that the harm caused to the Bevis Marks Synagogue would be negligible. However, this conclusion does not stand up to scrutiny in light of the nature of the Kiddush Levana ritual. The fundamental point is that the prayer is recited once each month after nightfall, when the waxing moon is visible. While GIA’s findings give the impression of negligible change in the current conditions, this outcome is rooted in their considering the impact of the proposal on views of the moon throughout the entire lunar transit, from moonrise to moonset, over an eighteen year cycle.

GIA’s 'wide-net’ analysis not only skews their results, it also fails to consider the month on month practical impact of the proposed tower on the ability of the community to worship, which would be significant. The proposed tower would lead to the cessation of the synagogue’s ritual several months a year, and further degrade the community’s ability to worship in the remaining months.

This determination has been corroborated by the BRE’s independent review of the GIA report (commissioned by City of London Corporation, 4 Nov)) and will be referred to in further detail in our conclusion.

We therefore ask that officers carefully consider the analysis presented below when considering this application, taking special account of the equality impacts of it on the Jewish community.

Rabbi Shalom Morris

Bevis Marks Synagogue

14 November 2024

Kiddush Levana

What follows in this section is a description of the:

1.Kiddush Levana prayer and ritual.

2.What is unique about its recital in the traditions of Bevis Marks Synagogue.

3.How the ritual has been recorded and altered in Europe, highlighting:

    1.The relationship between the ritual and synagogue.

    2.The impact of unpredictable climactic conditions.

Kiddush Levana in Judaism

Judaism's calendar is lunar, linking Jewish practices and festivals each month throughout the year to the moon's cycle. The appearance the new moon is:

1.Anticipated with a prayer on the Sabbath prior (Kiddush Hahodesh)

2.Celebrated upon its return (Rosh Hodesh)

3.Marked with a prayer of renewal (Kiddush Levana)

Kiddish Levana is Hebrew for 'Sanctification of the Moon,' and is a prayer recited each month by Jews. The prayer is a call for renewal, hence the link to the new moon which is becoming increasing visible during this part of the month. Therefore, the prayer is said when the waxing moon in visible in the night sky, commonly from day 3 to 15 of thus he lunar cycle.

The prayer is recited whilst standing outside, under an open sky, and requires sight of the moon. If the moon is blocked by either buildings or clouds, the prayer cannot be recited. However, if the moon is visible through a cloud, one can still recite the prayer.

Kiddush Levana takes about fifteen minutes to recite. It is typically recited following the evening service at a synagogue, so that it can be said with a prayer quorum. It is ideally also recited on a Saturday night when the congregation is still wearing their Sabbath finest.

Kiddush Levana is only recited from day ten in the Hebrew month of Av (typically July/ August), and from the 11th in Tishri (typically September/October), on account of the mourning/repentance that takes place during the first days of those months. This is because the prayer is meant to be recited whilst in a joyous spirit. In contrast, as the prayer is considered to be a petition, it is generally avoided on the eves of Sabbaths and Festivals when petition prayers are considered inappropriate.

Kiddush Levana at Bevis Marks Synagogue

Kiddush Levana has been practiced in the Bevis Marks Synagogue community since the 1600s. Evidence of this can be found in several Jewish sources.

1.Rabbi Jacob Sasportas, first rabbi of the London community (1663), writes of the practice in his Responsa *Ohel Yaakob* (67).

2.The prayer is included in the first Hebrew/ English Spanish & Portuguese (Sephardi) prayer book published by Alex Alexander in England in 1772 (pg 202).

3.David Aaron de Sola, reader of the Bevis Marks Synagogue congregation, includes the prayer in his 'Book of Blessings' published in 1829.

4.Rabbi Shemtob Gaguin, Chief Judge of the Spanish & Portuguese Jewish community in London includes discussions of the community's Kiddush Levana traditions in his work 1934 Keter Shem Tob (Vol 2.)

There are several particular traditions in Bevis Marks Synagogue with respect to Kiddush Levana. These peculiarities reinforce the risk posed to the congregation's unique cultural heritage should a development be approved that interferes with the community's worship.

1.At Bevis Marks Synagogue Kiddush Levana is *ideally* said from day seven of the lunar cycle until the middle of the month, as the moon is giving off more light in the second quarter of its cycle than it does at day 3, thereby giving more meaning to the prayer of renewal. See *The blessings, or, Expressions of praise and thanksgiving said by all Israelites on various occasions with an interlineary translation* published in 1829 by Bevis Marks Synagogue minister David Aaron de Sola (page 83). This is in accordance with the ruling of the authoritative R Yosef Karo (Shulhan Arukh), who along with the rest of the Iberian Jewish community was expelled from Spain in 1492. When climactic conditions are difficult, it is permitted to recite even from day 3.

2. Furthermore, in departure from other Jewish communities, there are nuances to the liturgy of the prayer, as well as the absence of certain mystical repetitions. See *Keter Shem Tob* by Rabbi Shemtob Gaguine, chief judge of the of the London Spanish & Portuguese Jewish community in the first half of the twentieth century (Part 2:1). This reflects the authentic Iberian tradition of Sephardi Judaism that is preserved at Bevis Marks Synagogue.

3. Finally, in the tradition of Bevis Marks Synagogue the prayer is called 'Birkat Levana', the 'Blessing of the Moon', and not 'Sanctification' or 'Kiddush' as it is more commonly called.



Germany 1726
Georg Puschner from Kirchners Judisches Ceremoniel

Kiddush Levana in European History

The peculiarity of this Jewish tradition caught the attention of European observers of Judaism during the early modern era. This can be seen in both visual and literary depictions. Indeed, the European context also influenced the practice and meaning of this ritual.

As stated above, the Kiddush Levana prayer is typically recited following the evening prayers whilst standing outside of the synagogue. This is depicted in historical drawing and prints of the ritual being performed in Europe in the seventeenth and eighteenth century, the years when Bevis Marks Synagogue was established. This reflects the relationship between the prayer and synagogue.



1695 Amsterdam
Haggadah

Literary observers of Judaism also recorded the tradition. The following account by English Christian religious writer John Allen in his 1816 work *Modern Judaism; or a Brief Account of the Opinions, Traditions, Rites, and Ceremonies of the Jews in Modern Times*, depicts the ritual with scorn (pg 379).

'On the first Saturday evening in the month, if the moon is then visible, or on the first evening after, when the sky is bright enough to have a clear view of her, the Jews assemble in the open air, for what is called "the consecration of the new-moon:" when some grave rabbi pronounces the following. benediction, in which he is joined by all the company…'.

Furthermore, the variability of weather patterns in Europe, became a central to the relationship of European Jews to the meaning of the prayer. For European Jews, cloud cover, a common concern, was seen as a bad omen, whilst a clear night was considered a positive sign, as the prayer for renewal could then be recited.

Finally, proximity in the northern hemisphere has made the recital of 'Kiddush Levana' notoriously difficult in locations like England during July and August with it short summer nights and associated lower arc of the moon.

The GIA Report

GIA's report was carried out on behalf the applicant to consider the impact of the proposed redevelopment on the synagogue's worshipping community's ability to recite the monthly prayer Kiddush Levana which requires sight of the moon. The report considers views of the moon from two positions, N and P, as well as during both the major and minor lunistices.

In analysing the data, GIA concludes that at the current baseline the synagogue only retains views of 2.2% of the lunar arc during a major lunistice. With the proposed building and previously approved buildings, this would decrease to 1.3%. These numbers take into account average atmospheric conditions which include cloudy skies. Slight variations to these results based upon major or minor lunistices and position P or N can be found in GIA's Table 01.

This note questions the data assumptions used by GIA to reach their percentage conclusions, the relevance of climatic conditions in their analysis, and mostly importantly considers the overall impact on ability of the community to continue to recite the Kiddush Levana prayer.

Climate Conditions

The Kiddush Levana prayer can only be recited when the moon is visible. Therefore, if obstructed by clouds or buildings, the prayer cannot be recited. Based upon the website https:// weatherspark.com GIA reported (pg 7) that London has cloudy conditions 58% of the time. As a result, they conclude that while in position N the moon should be visible 5.1% of the time, in practice this is likely to only be the case 2.2% of the time.

This conclusion is not robust. In practice cloud is not a "black or white" matter. Sometimes clouds are patchy; sometimes the moon can be seen behind a veil of cloud; furthermore, climate change is a dynamic and present consideration. In contrast, buildings are fixed. In other words, sometimes it is cloudy, sometimes it is not, but once a building is constructed, for all intents and purposes it becomes perpetually 'cloudy' with respect to the lunar visibility. The possibility of cloudy skies should therefore not be considered relevant when considering the impact of perpetually reducing lunar views. A comparison may be made with trees: in planning, trees are disregarded when visual impacts are assessed, because they are impermanent.

Beyond this, the variability of climate conditions themselves plays an important role in the Kiddush Levana ritual. Jews go outside after dark to see whether or not the moon is visible, whereupon a cloudy sky is considered to be a bad omen, and a clear sky a positive one, as it allows for the prayer to be recited. The fixed reduction of visibility by the proposed tower would be a permanent obstruction, removing this variability which is central to the meaning of the ritual.

Furthermore, as reciting the prayer takes approximately a quarter of an hour, the preservation of sufficient unobstructed sky allows for the possibility that any cloud cover will pass, thus enabling the prayer to be recited despite earlier cloudy conditions. This would not be the case should the view be obstructed by a permanent building.

GIA Percentages

GIA concludes (pg 37) *'Additional obstructions in the Future Baseline and Cumulative scenarios will lead to a small absolute reduction in visibility of the lunar bracelet*.' This conclusion, without critiquing the method of analysis itself, is highly misleading. The data provided allows for different percentage conclusions to be reached, depending on which data is considered. In GIA's instance, they've stated (pg 3): '*In order to capture all possible lunar position across the sky, a period of 18.6 years has been studied. This is the length of time needed to conclude a full lunar cycle. All possible locations of the moon's passage have been captured within a lunar bracelet depicted in the sky (see* fig *.1). Once the obstructions already visible from the Synagogue's courtyard are considered, once the passage of the moon during daylight hours are discounted, and the probability of cloudy skies taken into account, the opportunities to see the moon's passage to recite "Kiddush Levana" are limited to 2.2% of the time over 18.6 years*'.

In other words, GIA's percentages are based upon all potential visibility of the moon over the horizon throughout the night sky during this 18.6 year window. In very few settings would the moon ever remain visible constantly throughout this time as any buildings, or landscape features, would reduce this visibility. Of greater consequence is consideration of the amount of time the moon is visible over the Bevis Marks Synagogue, and what impact would the proposed tower have on it.

In this respect, according to GIA the reduction from the current baseline to the future conditions, would be a decrease of 41% - nearly half - marking a very significant reduction in lunar visibility for the synagogue community.

Level of Obstruction

GIA state "*During a minor lunistice, the opportunities of seeing the passage of the moon above the Synagogue are further reduced to 1.8% of the lunar bracelet, owing to the lower transit of the moon in the sky. This means that the passage of the moon will not be visible above the Synagogue's sky, for most months each year.*"

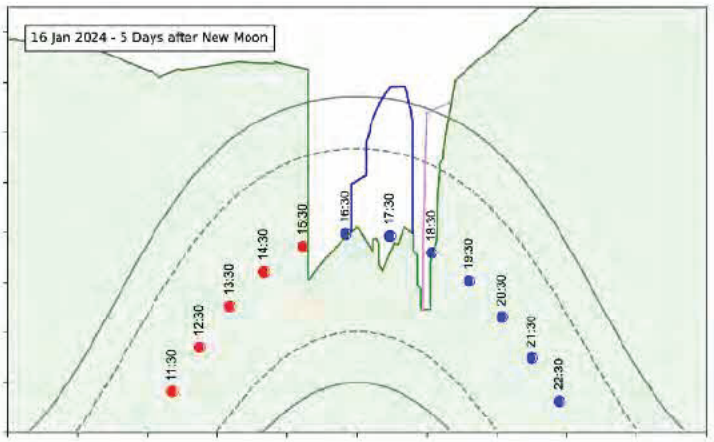
GIA furthermore claim "*during each observation period, the lunar transition will be remain observable, assuming that it would have been in the Baseline scenario, even with the consented 100 Leadenhall and the proposed 1-4, 31-34 Bury Street in place.*"

Both of these claims are unsupported by the data provided (daily graphical representations of the moon passage set against the backdrop of proposed and approved buildings, as made available in their "Additional Information", see Appendix-1 below, and graph to the right). According to GIA's own data, the moon is visible over Bevis Marks Synagogue most months of the year. Furthermore, should the proposed tower be approved, the moon would not be observable in the night sky for at least 3 months a year, when it is currently visible. This is the case in May, June and September during both major and minor lunistices. In some instances it would no longer remain visible in April and October either. During a minor solstice, the reduction of lunar visibility caused by the proposal would be even more dramatic owing the the lower amounts of current visibility.

Furthermore, even during the months when the moon would remain visible, the proposed tower would reduce the numbers of days, and hours in those days, when the moon is visible in the night sky. In some months it would reduce it to one or two days, when the possibility of cloudy conditions would then have a significant impact on the ability to recite the prayer anymore in those months, particularly as the remaining hours of visibility will be quite brief, at times not even long enough to recite the prayer or to make it unlikely to perfectly time a service to ensure visibility.

This point has been born out in the BRE review which found that even in months when some moon views remained, these were of extremely short duration (thirty minutes over two days). This would render the ability and likelihood of being able to recite the Kiddush Levana as improbable, and as such the proposed tower would result in a scenario even those months as akin to blocking out the moon completely.

In this regard, the proposed tower, would result in a quantifiable reduction in the community's ability to worship. Assuming the prayer can currently be recited on average 10 months a year, and in the proposed conditions at most 6 months a year, and more likely only 4 or 5 times, the impact of the proposal would result in a considerable reduction in worship of 40% to 60% of the time.





Conclusion

GIA mischaracterises the negative impact of the proposed tower by casting a wide net of data points, which present a skewed picture of the current ability of the community to worship, and the degree of harm it would experience should the scheme be approved. In practice, the proposed tower would reduce overall visibility of the moon from the current baseline by 40%-60%. GIA acknowledge a 40% loss.

The data provided by GIA though makes it clear that in absolute terms, the proposed tower would reduce the ability of Bevis Marks Synagogue to worship as it has since 1701 by at least 3-5 months per year, causing a reduction in the times the community can worship of 30%-50%, possibly even by 60%.

The BRE report corroborates this conclusion. 'With both the consented and proposed developments in place (in the cumulative scenario), the opportunity to view the moon from the observer location used by worshippers at Bevis Marks Synagogue when reciting Kiddush Levana would reduce by 51% on average throughout a full lunar cycle, compared to the existing baseline.

According to the BRE, 'Based on the results reported in the GIA lunar transit study…the relative reduction in the hourly visibility of the lunar bracelet from the Synagogue courtyard would be significant with the proposed development in place'.

It is clear then that the proposed tower would cause significant harm to the historic community of Bevis Marks Synagogue. The proposed tower would undermine its centuries-long history of worship on this site, and their ability to maintain of their unique Spanish & Portuguese Jewish traditions.

Put into heritage terms, the planning system is concerned with the *significance* of heritage assets. The sky view as an entity of cultural/ religious importance in Judaism is surely a very important contributor to the Synagogue's significance as a working synagogue. This is made all the more significant as Bevis Marks Synagogue is likely the only one in the world in continual use dating back to 1701, and is the oldest synagogue in the UK. Hence, if these sky views are severely impaired, not only does our minority community suffer damage to our culture, but the heritage asset (the Grade-1 Listed Bevis Marks Synagogue) loses significance. This is in addition to the substantial loss of significance in conventional heritage terms.



Kiddush Levana, 14 Nov 2024



Image of proposed tower blocking out essential clear-sky backdrop

Appendix 1 - Month on Month Analysis of Lunar Visibility in Number of Visible Days

P Major

Month	Current Days	Projected Days	Percent Loss
January	11	8	27.2727272727273
February	11	8	27.2727272727273
March	10	8	20
April	8	4	50
May	4	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	4	2	50
November	4	3	25
December	8	6	25
Total	63	39	38.0952380952381

P Minor

Month	Current	Projected	Percent Loss
January	11	8	27.2727272727273
February	11	8	27.2727272727273
March	10	7	30
April	6	3	50
May	4	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	3	1	66.6666666666667
October	5	3	40
November	7	4	42.8571428571429
December	9	7	22.2222222222222
Total	68	41	39.7058823529412

N Major

Month	Current	Projected	Percent Loss
January	11	7	36.3636363636364
February	12	8	33.3333333333333
March	11	6	45.4545454545455
April	6	2	66.6666666666667
May	4	0	100
June	1	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	3	0	100
November	5	2	60
December	7	4	42.8571428571429
Total	61	29	52.4590163934426

N Minor

Month	Current	Projected	Percent Loss
January	11	7	36.3636363636364
February	12	5	58.3333333333333
March	10	4	60
April	6	0	100
May	3	0	100
June	2	0	100
July	0	0	0
August	0	0	0
September	1	0	100
October	5	0	100
November	6	3	50
December	8	5	37.5
Total	64	24	62.5

Appendix 3 - Letter from Professor Barry Stiefel

COLLEGE of CHARLESTON
DEPARTMENT OF ART AND ARCHITECTURAL HISTORY

Hgh Consulting
45 Welbeck Street, London W1G 8DZ

11 November 2024 / 10 Heshvan 5785

Subject: The Effects of Tall Development Too Close Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue

Dear Bella Tidswell and Rabbi Shalom Morris,

This letter is in response to your correspondence from 8 November 2024 / 7 Heshvan 5785 regarding the significance of the sky view from Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, a Grade I listed building. This is of consequence, considering that the congregation's Hebrew name, Qahal Kadosh Sha'ar ha-Shamayim, translates as the Holy Congregation of the Gates of Heaven. Visual access to the heavens is thus of great importance in the deliberations regarding compliance with the National Planning Policy Framework regulations, especially paragraphs 205 and 206.

The moon, stars, and sun hold significant cultural and religious importance for Sephardic Jews, as they do for many Jewish communities, with Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue being an epitomic example as the oldest Jewish congregation in the British Isles. To begin with, the Jewish calendar is primarily lunar, meaning it is based on the cycles of the moon. This affects the timing of Jewish holidays, including Passover, Sukkot, and Rosh Hashanah. The sighting of the new moon is particularly important as it marks the beginning of a new month (Rosh Chodesh). Sephardic Jews, like other Jewish communities, recite a special series of blessings called Kiddush Levana. This blessing is said once a month, typically after the appearance of the new moon but before it reaches its full phase. It is a moment of reflection and gratitude for the natural world and its cycles.

In Jewish mysticism (Kabbalah), the moon often symbolizes the *Shekhinah*, the divine presence. The phases of the moon can represent different spiritual states and the relationship between the divine and the Jewish people. Historically, the observation of celestial bodies was crucial for navigation and agriculture. For Sephardic Jews, who have lived in various parts of the world, from the Iberian Peninsula to North Africa and the British Isles, understanding the stars and the moon was essential for daily life and survival. Some Sephardic communities have unique customs and traditions related to the moon and stars. These might include specific prayers, songs, or rituals that have been passed down through generations. For Sephardic Jews, the stars in the sky hold both practical and symbolic significance. Historically, stars were essential for navigation, especially for Sephardic Jews who navigated across the British Atlantic World and beyond. The stars helped determine directions and seasons, which was crucial for travel and agriculture. Stars are often seen as symbols of God's creation and the vastness of the universe. They remind

the Jewish people of their place in the cosmos and the greatness of the Creator. The stars are mentioned in various parts of the Torah and other Jewish texts. For example, God's promise to Abraham that his descendants would be as numerous as the stars in the sky (Genesis 15:5) is a powerful symbol of continuity and divine blessing.

In some Sephardic traditions, specific prayers and blessings are associated with the stars. These practices can vary by community but often include expressions of awe and gratitude for the natural world. In Kabbalistic thought, stars can represent spiritual entities or forces. They are sometimes seen as channels through which divine energy flows into the world. Certain Jewish holidays and rituals are tied to the appearance of stars. For example, the end of Shabbat is marked by the appearance of three stars in the sky, signaling the beginning of a new week.

The sun also holds significant religious, cultural, and practical importance for Sephardic Jews. The sun's cycle dictates the timing of daily prayers. For example, the Shacharit (morning prayer) is recited after sunrise, and the Mincha (afternoon prayer) is said before sunset. The sun's position helps structure the rhythm of daily religious life. The setting of the sun marks the beginning and end of the Sabbath (Shabbat) and Jewish holidays. Shabbat begins at sunset on Friday and ends at sunset on Saturday, making the sun's cycle integral to these observances. Once every 28 years, a special blessing called Birkat Hachama is recited to thank God for the creation of the sun. This rare event is a significant moment of reflection and celebration in the Jewish calendar. The sun is often seen as a symbol of God's power and the light of divine wisdom. It represents the consistency and reliability of God's presence in the world. Historically, the sun was crucial for agriculture, which was a central part of life for many Sephardic Jewish communities. The sun's light and warmth were essential for growing crops and sustaining life. Some Sephardic traditions have specific customs and rituals associated with the sun. These might include prayers or blessings said at sunrise or sunset. In Kabbalistic thought, the sun can represent various spiritual concepts, such as the divine light that sustains the universe. Its daily journey across the sky is seen as a metaphor for spiritual enlightenment and the journey of the soul.

Regarding Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, blocking out the sky with new development (even partially) could pose several problems for Sephardic Jews, given the cultural and religious significance of celestial objects:

1. **Interference with Religious Observances**: The sighting of the moon is crucial for marking the beginning of new months and for reciting the Kiddush Levana blessing. If the sky is obstructed, observing these important religious practices would be challenging.
2. **Disruption of Daily Prayers**: The sun's position is essential for timing daily prayers. Obstructions that block the view of the sun could make it difficult to determine the correct times for Shacharit (morning prayer) and Mincha (afternoon prayer).
3. **Impact on Sabbath and Festivals**: The setting of the sun marks the beginning and end of the Sabbath and Jewish holidays. If the view of the sunset is blocked, it could complicate the observance of these sacred times.
4. **Loss of Symbolic Connection**: The stars, moon, and sun are powerful symbols in Jewish tradition, representing God's creation, divine presence, and spiritual enlightenment. Blocking the view of these celestial bodies could diminish the sense

of connection to these symbols. This is especially crucial for Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue, the Holy Congregation of the Gates of Heaven.

5. **Cultural and Historical Disruption**: For Sephardic Jews, who have historically relied on the stars for navigation and timekeeping, obstructing the sky could sever a link to their cultural heritage and historical practices.
6. **Challenges to Mystical Practices**: In Kabbalistic thought, the celestial bodies are seen as channels of divine energy. Obstructing the view of the sky could interfere with mystical practices and the spiritual significance attributed to these celestial objects.

Overall, blocking out the sky with new development could significantly disrupt the religious, cultural, and spiritual practices of Sephardic Jews, making it difficult to maintain their traditions and observances. Therefore, I highly recommend that disruptions to the sky view from Qahal Kadosh Sha'ar ha-Shamayim / Bevis Marks Synagogue be minimized and mitigated as much as possible. Addressing these efforts should be done in consultation as much as possible with the congregation and its spiritual leaders as the law permits. Do let me know if you have any further questions or concerns.

Sincerely,

[redacted]

Barry L. Stiefel, Ph.D.
Professor of Historic Preservation & Community Planning
Department of Art & Architectural History
Jewish Studies Program Affiliate
College of Charleston
[redacted]

Appendix 4 - Advice from Lord Banner K.C.

hgh

Fwd: Bevis Marks Synagogue

1 message

From: **Charles Banner KC** [redacted]
Date: Fri, 4 Oct 2024 at 12:4
Subject: RE: Bevis Marks Synagogue
To: Roger Hepher [redacted]
Cc: Bella Tidswell [redacted], Rabbi Shalom Morris [redacted] Michael Bear> [redacted]
Michael Keats [redacted], Tilla Crowne [redacted], Julian Cooper [redacted]

Dear Roger,

Thank you very much for your message. My starting point for considering your questions is para. 206 of the NPPF, which (giving effect to the Planning (Listed Buildings and Conservation Areas) Act duties), requires a "clear and convincing justification" for any harm to the significance of a heritage asset.

In the circumstances you describe below, and in light of how the proposed development is pitched, it would be amply open to the Council to take the view that the "clear and convincing justification" for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist without (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of harm that would be caused – including viability evidence.

Very best wishes,

Charlie

Lord Banner K.C.

KEATING CHAMBERS

T: [redacted]

LinkedIn | Website

I often work late hours and weekends but I do not expect others to: if you receive this message outside normal working hours, there is no need for an immediate response.

Appendix 5 - Advice from Claire Nevin

IN RESPECT OF

BEVIS MARKS SYNAGOGUE

Advice on Equalities Statement for the proposed redevelopment of Bury House

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Introduction

1. In instructions dated 17 October 2024, I was asked by Roger Hepher of hgh Consulting, on behalf of the S&P Sephardi Community at Bevis Marks Synagogue ("**BMS**"), to advise on the Equalities Statement accompanying the live planning application for the proposed redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR (ref. 24/00021/FULEIA) ("**the planning application**"). The purpose of the Equalities Statement is to assist the City of London in discharging its legal duties to consider the equality impacts of the planning application in its role as the planning authority.

2. The planning application and related application for listed building consent were submitted to the City of London in January 2024. The proposed development comprises the demolition of Bury House and construction of a 43-storey tower, the partial demolition of Holland House and Renown House and extensions to both buildings, for office, flexible retail/café and flexible community/education/cultural/amenity uses.

3. I was specifically asked to advise on whether the Equalities Statement is sufficiently detailed on the potential impacts of the planning application on the Jewish community at BMS to discharge the legal requirement for decision makers to have due regard to equality considerations throughout the decision-making process.

4. My advice will first address the factual background, including the circumstances of BMS. I will then set out the legal framework and relevant caselaw governing the assessment of equalities impacts under the *Equality Act 2010* ("**EqA 2010**") followed by my views on whether the Equalities Statement is sufficiently detailed.

5. This advice is my independent and impartial view of the application of the law to the facts of this case. If the S&P Sephardi Community at BMS decides to waive legal advice privilege and put this advice in the public domain, I kindly request that it avoid selective quotation, which may be taken out of context. If the advice is made public, I will not assume liability for any reliance by third parties.

Factual Background

BMS and the Jewish Community

6. BMS dates back to 1701 and is the oldest and most historically significant synagogue in the country, often referred to as the 'Cathedral' Synagogue due to its significance within the Jewish faith. It is widely recognised as being of outstanding communal, architectural, artistic, historic and archaeological significance and its importance both within the City of London and on a national level is recognised by its Grade I Listed status. This is the highest level of listing, meaning the building is deemed, on a national level, to be of 'outstanding' special architectural and historic interest. Indeed, the Historic England Grade 1 listing notes that the Synagogue's "*little altered state is of exceptional historic interest.*"

7. The Synagogue stands within a courtyard which functions as part of the Synagogue and is of great value to the community as a social and religious space, for gathering before and after services and for holding events. My instructions and supporting documents explain that the unobstructed night sky view from the courtyard serves an important spiritual and ritualistic purpose that is central to Jewish practice.

8. The weekly celebration of the Sabbath does not officially end until the average person can see three medium sized stars in the sky; a ritual that is consciously observed from the courtyard of BMS every week. Members of the congregation at BMS further rely on the appearance of three medium sized stars in the sky to fulfil their daily obligation of reciting the *Shema Yisrael* every evening. Although the congregation may rely on the clock when it is too cloudy to observe the appearance of the three stars, the centuries old practice of observing them from the courtyard is of fundamental importance to religious practice at BMS.

9. Similarly, the beginning of each new Jewish (lunar) month is marked by the appearance of the new moon. Each month, approximately one week after seeing the new moon, the BMS congregation gathers outside in the courtyard to recite a special blessing over the new moon. The permanent obstruction of the night sky view from nearby development would render it impossible to perform the prayers because the moon would no longer be visible from the courtyard for significant periods of time. A key ritual observed at this site for hundreds of years would therefore be permanently lost to the Synagogue community.

10. The sky view is also critical to ensuring that enough daylight reaches the interior of the Synagogue. Adequate natural light is key to religious worship at BMS given the intrinsic nature of reading a large quantity of printed texts to Jewish worship. Adequate light levels must be maintained within the Synagogue for this to continue. The amount of natural light in the Synagogue has already been reduced by the construction of higher buildings in the surrounding area and its status as a listed building greatly restricts the possibility of installing further electrical lighting. I understand from my instructions that any further reduction in natural light would jeopardise the ability of the congregation to read from the printed texts.

11. Furthermore, ample light is crucial to safely carrying out circumcisions at the Synagogue; a practice that has continued uninterrupted at BMS for over three hundred years. My instructions explain that those who conduct circumcisions at BMS have raised concerns that any further reduction to light levels would render it impossible to carry out circumcisions at BMS.

Previous planning decisions

12. In October 2021, the City of London's Planning and Transport Committee refused a previous, similar application by the same applicant (an application for a 48-floor tower at 31 Bury St). The refusal identified two harms. The first was harm to the setting and amenities of Grade-1 listed Bevis Marks Synagogue by reason of the "*overbearing and overshadowing impact of the development on the courtyard of the Synagogue*." The second was harm to the World Heritage Site Tower of London.

13. The main difference between the new planning application and the application that was refused in October 2021 is a reduction in height of 19m and two high-level setbacks. BMS considers these modifications to be of little consequence given that the proposed development would be 178.7m high in any event. However, the newly designated Creechurch Conservation Area, within which BMS and the proposed development site at Bury Street sit since its formal designation in January 2024, is a key difference.

14. In November 2021, the Secretary of State refused permission for the 'Tulip' skyscraper in the City of London. BMS was amongst the heritage assets considered in the decision, with the Secretary of State finding that the setting of BMS is "*largely limited to what can be experienced from within its courtyard*" and the "*wider setting*" of the Synagogue "*includes a number of office towers, visible from the courtyard*." Regarding BMS and a number of other heritage assets, the Secretary of State remarked that the Tulip would "*cause a marked exacerbation in the existing harm from tall buildings to the setting of the assets and the ability to appreciate their architectural or historic significance. The effect would be variously to create an overbearing presence from within the curtilage of the heritage asset (…)*" (in relation to BMS).

The City Plan 2040

15. The City Plan, which was submitted for examination on 29 August 2024, sets out the City Corporation's vision, strategic objectives and planning framework to guide future development and decision-making in the City of London to the year 2040. Inspectors have been appointed to carry out the examination but the dates for examination have not yet been published.

16. The City Plan proposes to include the Synagogue within the Tall Buildings Area and remove the current presumption against tall buildings in the Conservation Area. It further proposes to protect only the "immediate setting" of the Synagogue. Weight is of course a matter for the decision-maker. However, given the draft City Plan is still in the relatively early stages of the decision-making process, it should be given no more than limited weight by the Committee when it comes to decide the planning application.

BMS' objection to the planning application

17. In May 2024, BMS submitted a detailed, 33-page objection to the planning application describing the interrelationship between the Synagogue's heritage and religious significance. The main objections included in this letter can be summarised as follows:

    (i) The proposed development would cause substantial harm in heritage terms to the significance of BMS and its setting, substantial harm to the character and appearance of the Creechurch Conservation Area, and less than substantial harm to a number of other heritage assets.

    (ii) The Synagogue is one of the most natural light-sensitive places in London, where extensive reading of printed scripts is fundamental to worship, and the proposal would have an unacceptable impact on internal daylight levels.

    (iii) The proposal would result in an unacceptable level of overshadowing to the courtyard of the Synagogue, which is used for a variety of community and religious uses.

    (iv) The view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue. The proposal would block this critical view which is important to the functioning of the Synagogue.

Legal Framework

Primary Legislation

18. Section 149 of the EqA 2010 (which is referred to as the 'general equality duty') provides that:

    (1) A public authority must, in the exercise of its functions, have due regard to the need to—

    (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(…)

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(…)

(7) The relevant protected characteristics are—
age;
disability;
gender reassignment;
pregnancy and maternity;
race;
religion or belief;
sex;
sexual orientation.

19. It will be apparent from the above that having "*due regard*" to equalities impacts imposes positive obligations on decision makers to "***advance*** *equality of opportunity*", "***foster*** *good relations*", "***remove or minimise*** *disadvantages*" and "***take steps***" to meet the needs of persons who share a protected characteristic [emphasis added]. It therefore follows that the starting point for decision makers subject to the PSED is to robustly consider the *positive steps* they can take to meet the needs of persons who share protected characteristics, remove or minimise disadvantages etc. It will not be sufficient for the purposes of s.149 to accept harm as a foregone conclusion and then merely

decide on the level of harm that will be acceptable to those sharing a relevant protected characteristic.

Guidance

20. The Equality and Human Rights Commission's 'Technical Guidance on the Public Sector Equality Duty: England' (updated in April 2023) explains at para 2.17 that the public sector equality duty ("**PSED**") "*applies to individual decisions as well as policy formulation (…)*" although "*this does not mean that what the duty requires those exercising the function to do in both these situations is the same. The courts have made it clear that the regard due when exercising a function will depend on the circumstances in which a function is being exercised.*"

21. The Guidance clarifies at para 2.39-2.40 that to 'have due regard' means "*that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the general equality duty (…) How much regard is 'due' will depend on the circumstances and in particular on the relevance of the aims in the general duty to the decision or function in question. The greater the relevant and potential impact, the higher the regard required by the duty.*"

22. As to how the different needs of people with protected characteristics might be met when those needs differ from those without them, the Guidance clarifies that the duty is to meet 'needs' rather than any desires or preferences. The need must be intrinsic to the protected characteristic. In the context of the protected characteristic of religion or belief, the Guidance clarifies at para 3.30 that a relevant body "*may have to have regard to meeting needs which arise as a consequence of religious belief, where these arise in the context of a function which they do have*."

23. Complying with the general equality duty in practice entails ensuring a sound evidence base because in order to give proper consideration to the aims set out in the general duty, the relevant decision-making body will need to have sufficient evidence of the impact its policies and practice are having or are likely to have on people with protected characteristics (The Guidance at para 5.15). This entails sufficient understanding of the disadvantages or different needs of people who share a particular protected characteristic.

24. Importantly, it will be necessary to collate relevant information to have evidence-based decision-making and a body subject to the PSED will need to be able to show that it had adequate evidence to enable it to have due regard to its s.149 duty. Para 5.17 of the Guidance states that "*adequate and accurate equality evidence, properly understood and analysed, is at the root of effective compliance with the general equality duty. Without it, a body subject to the duty would be unlikely to be able to have due regard to its aims*."

25. A proper evidence base allows a body to understand the effect of its policies, practices and decisions, to consider whether further research or engagement is necessary, to consider whether there are ways of mitigating any adverse impact identified and decide whether to modify or reconsider a policy, practice or decision (para 5.18 of the Guidance). A relevant body cannot hide behind a lack of evidence or information about a relevant issue to justify not being able to meet the PSED. If the body does not have sufficient evidence to have due regard under s.149, it will need to obtain it (para 5.23 of the Guidance).

Case Law

26. The above principles set out in the Guidance are derived from case law. The seminal cases on the general equality duty are summarised below.

27. In *Hotak v Southwark LBC* [2015] UKSC 30; [2016] AC 811 at [73-76], the Supreme Court identified "*valuable judgments in the Court of Appeal*" explaining what the PSED requires. For instance:

    (i) At [75], the Supreme Court referred to the case of *Bracking v Secretary of State for Work and Pensions [2013] EWCA Civ 1345, [2014] Eq LR 40* which clarifies that the PSED "*must be exercised in substance, with rigour, and with an open mind*" (per Aikens LJ in *R (Brown) v Secretary of State for Work and Pensions [2008] EWHC 3158 (Admin), [2009] PTSR 1506* , para 92).

    (ii) At [75], the Supreme Court further approved the principle set out in *R (Hurley & Moore) v Secretary of State for Business, Innovation and Skills* [2012] EWHC 201 (Admin) according to which, it is for the decision-maker

to determine how much weight to give to the duty: the court simply has to be satisfied that "*there has been rigorous consideration of the duty (…) the court cannot interfere … simply because it would have given greater weight to the equality implications of the decision.*"

(iii) Drawing the threads together, the Supreme Court remarked at [74] that having 'due regard' means take account of what is ""*appropriate in all the circumstances" (…) I do not think it is possible to more precise or prescriptive, given that the weight and extent of the duty are highly fact-sensitive and dependent on individual judgment*."

Advice

The Equalities Statement

28. Taking the above legal framework into account, what counts as 'due regard' for the purposes of s.149 of the EqA 2010 depends on what is appropriate in the circumstances. The extent of the duty is highly fact-sensitive and will change from case to case. However, given BMS' unique status as the oldest and most historically significant Synagogue in the country, its recognition as a 'cathedral Synagogue' with over three hundred years of continuous worship and its Grade I listing that reflects its exceptional heritage value, I consider that an Equalities Statement accompanying a proposed development of this scale would have to demonstrate a sufficient understanding of the specific potential impacts of the development proposal on the Jewish community at BMS.

29. Furthermore, given the positive obligations on decision makers subject to the PSED, the City of London will have to go beyond merely demonstrating an understanding of the religious practices of the Jewish community at BMS to actively considering the positive steps it can take through its decision making functions as a planning authority to meet the needs of those who worship at BMS, remove or minimise disadvantages facing them, foster good relations and advance equality of opportunity.

30. The Equalities Statement notes at paras 3.27-3.28 that 2% of the City of London's residents are Jewish and BMS is one of a number of places of worship in close proximity to the site.

31. BMS is directly addressed from para 3.43 onwards where the Equalities Statement makes the following observations:

    (i) BMS is located approx. 30m north of the site. It is a place of worship and a community facility. It is the oldest Synagogue in the UK and the only Synagogue in Europe to have held regular services continuously for more than 300 years.

    (ii) It notes the times of Shabbat and the fact that the Synagogue is used for various celebrations, as well as the fact that it is of significance to the Jewish community because of its heritage.

    (iii) It remarks that the Synagogue is open to visitors and received a lottery grant in 2019.

32. The Equalities Statement notes in the table at page 19 that impacts of the proposed development may have different impacts on the protected characteristic of religion or belief due to how places of worship are used for religious ceremonies. Specific impacts to BMS are noted from para 4.38 and are said to include:

    (i) **Townscape and visual impact**. The Equalities Statement concludes that the proposed development will alter the visual backdrop to the Synagogue from the courtyard but that this does not impact on the use of the Synagogue or its courtyard for religious activities.

    (ii) **Noise**. However, the Equalities Statement notes that contractors will have close regard to the religious calendar to limit disruption during religious events.

    (iii) **Daylight and sunlight**. The Equalities Statement notes that the Synagogue is sensitive due to the reliance of candlelight only during religious ceremonies where the congregation need to be able to read from the Torah. However, it goes on to note that the Synagogue currently receives very low levels of light. It further states that as the proposed development would lead to a small reduction in the amount of daylight received, it is unlikely to affect the current use of these areas or increase the requirement for artificial lighting.

(iv) **Night sky visibility**. The Equalities Statement addresses the proposed development's potential impact on the ability to observe the night sky during Shavuot, noting that the proposal will not materially affect the ability to observe the night sky from the courtyard. However, the Equalities Statement concludes that high levels of light pollution in London limit the potential for night sky observations.

33. The s.149 duty is primarily one of process rather than outcome ('have due regard'). I therefore consider that the Equalities Statement contains just enough information on the potential daylight and sunlight impacts of the proposed development for the reading of religious texts to discharge the PSED. However, it completely fails to address the potential daylight and sunlight impacts on the ability to continue carrying out circumcisions in the Synagogue. This was raised in BMS' objections so it should have been addressed in an updated Equalities Statement.

34. Concerning the night sky view, the Equalities Statement refers to the potential impacts on the continuing observance of Shavuot but is entirely silent on the importance of the night sky view to the weekly observance of Shabbat, the daily obligation to recite the *Shema Yisrael* and the monthly blessing on the appearance of the new moon. BMS' objection raised these specific points and explained the ways in which the development proposal's obstruction of the night sky view might prevent these religious practices from taking place.

35. Without giving "*rigorous consideration*" to these specific issues, it is hard to see how the Equalities Statement can safely conclude that the recognised alterations to the visual backdrop to the Synagogue from the courtyard would "*not impact on the use of the Synagogue or its courtyard for religious activities*."

36. I consider on balance that the Equalities Statement is not sufficiently detailed on the potential impacts on the Jewish community at BMS to continuing worshiping in accordance with their faith. The failure of the Equalities Statement to address several key aspects of the night sky view and the importance of adequate lighting for circumcisions does not comply with the Guidance and case law which requires the PSED to be "*exercised in substance, with rigour"* (*Bracking*) and "*have regard to*

meeting needs which arise as a consequence of religious belief" (para 3.30 of the Guidance).

37. It is trite that planning authorities must carefully balance different (sometimes competing) factors and decide how they should weigh in the overall balance. However, certain factors will always weigh more heavily in the balance than others. The Guidance clearly states "*the greater the relevant potential impact, the higher the regard required by the duty*." Considering the importance of the PSED and the extent of the potential impacts of the development proposal on the Jewish community at BMS, I consider that this is a case that warrants the heightened regard envisaged by policy and by extension, substantial weight in the overall planning balance.

Statement of Reasons

38. With some exceptions, planning committees are not generally required to give reasons for decisions to grant planning permission. The extent of the duty to give reasons for granting planning permission was discussed in *Dover DC v Campaign to Protect Rural England (Kent)* [2017] UKSC 79; [2018] 1 W.L.R. 108 where the at [59], the Court held *"(…) it should not be difficult for councils and their officers to identify cases which call for a formulated statement of reasons, beyond the statutory requirements. Typically there will be cases where, as in Oakley and the present case, permission has been granted in the face of substantial public opposition and against the advice of officers, for projects which involve major departures from the development plan, or from other policies of recognised importance (such as the "specific policies" identified in the NPPF - para 22 above). Such decisions call for public explanation, not just because of their immediate impact; but also because, as Lord Bridge pointed out (para 45 above), they are likely to have lasting relevance for the application of policy in future cases.*"

39. If the City of London decides to grant planning permission, I consider that such a decision would fall within the categories envisaged by the Supreme Court where a formulated statement of reasons would be required. This is because:

    (i) There is substantial public opposition to the proposals.

    (ii) A very similar proposal was refused in 2021 and the area now enjoys heightened statutory and policy protections due to its recent designation as a Conservation

Area. The proposal is therefore likely to involve major departures from the development plan and other policies of recognised importance.

(iii) Given the City of London's recent decision to refuse a similar application and the recent designation of the Conservation Area, a formulated statement of reasons would be required to explain consistency of decision making.

(iv) The decision would be likely to have both an immediate impact on the Jewish community at BMS (amongst others affected by the proposals) and lasting relevance for the application of policies relating to tall buildings and conservation areas in future cases.

(v) Section 149 contains a positive duty to have 'due regard' to equalities impacts. In the absence of a formulated statement of reasons, it would otherwise be difficult to ascertain whether the City of London complied with this duty.

40. These observations on the duty to give reasons are relevant to understanding how an eventual decision to grant planning permission might be otherwise vulnerable to legal challenge. For the reasons stated above, a complete failure to give reasons in this case could be subject to legal challenge.

41. However, if reasons are given and the committee remedies the inadequacies of the Equalities Statement by robustly considering the specific potential impacts to BMS, it would be hard to argue that the PSED has not been discharged. That is unless the committee nonetheless gives irrational reasons for granting permission (a high hurdle). In any event, even if the committee robustly considers the potential equalities impacts on BMS but nonetheless decides to override the needs of the Jewish community in favour of the development proposal, I am of the view that a clear statement of reasons would be required.

Conclusions

42. My conclusions are as follows:

(i) The Equalities Statement does not comply with s.149 of the EqA 2010 as it does not sufficiently address the potential impacts of the planning application on the ability of the Jewish community at BMS to continue worshipping in accordance with their faith. While it addresses some points (reading religious texts by natural light), it completely ignores several important potential impacts on the ability of the Jewish community at BMS to continuing worshipping in accordance with their faith.

(ii) If planning permission is granted, I consider that a formulated statement of reasons will be required to demonstrate compliance with the PSED.

CLAIRE NEVIN

18 November 2024

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Anna Tastsoglou
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28 November 2024

Dear Ms Tastsoglou,

Bury House, 1-4, 31-34 Bury Street, London EC3A 5AR: Follow-Up Objection on behalf of The S&P Sephardi Community

On behalf of our client, The S&P Sephardi Community, we write further to our previous letters dated 15 May 2024 and 15 November 2024, in relation to the planning application (ref. 24/00021/FULEIA) and the related Listed Building Consent application relating to the redevelopment of Bury House, 1-4, 31-34 Bury Street, EC3A 5AR.

This letter accompanies two further documents supporting our client's objection to the proposals:

- An assessment of the impact on the Synagogue of the proposed development in Heritage/Townscape terms, prepared by Donald Insall Associates (Appendix 1); and
- A paper by Rabbi Shalom Morris providing further contextual detail on Bevis Marks Synagogue and its setting (Appendix 2).

This letter briefly summarises these additional documents and reiterates our client's objection to the proposed development.

Heritage/Townscape Impact Assessment

Donald Insall Associates has been instructed by The S&P Sephardi Community to prepare a professional third-party assessment of the heritage impacts of the proposals, particularly the impact of the proposed development on the significance of Bevis Marks Synagogue. The report finds that, in summary, the proposals for the Bury Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue.

Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as *'the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting'*.

This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well as its courtyard setting which frames the building and allows community and religious activities to take place.

The report concludes that the proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting.

Setting Study

Rabbi Shalom Morris has prepared a study of the setting of Bevis Marks Synagogue, with reference to its specific cultural and religious context and Jewish sources. The report draws on sources including Jewish religious law and the communal records kept at the Metropolitan Archives, alongside discussion of the community over time and how it operates today. Reflecting on these sources, the report explains the wide-ranging harm that the proposed tower would cause to the significance of the Synagogue, in terms of harm to:

- The original architectural intent of the Synagogue's design;
- Religiously important sky views;
- Interior light levels necessary for prayer;
- The purposeful functioning of the architecturally significant windows;
- The amenity of the communally important courtyard;
- The meaning of the Synagogue's name; and
- The economic viability of the site.

Summary

The documents enclosed further support our client's position that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.

We have previously set out the reasons for which the application should be refused; we repeat these here for emphasis. It remains clear the applications should be refused, for the following reasons (inter alia):

1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and the sensitivity of the Synagogue to changes in light levels.

2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused.

4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration.

5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use.

6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits.

7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it).

As planning officers of undoubted integrity, I trust you and your colleagues will recognise the above, and also that any attempt to justify recommending approval would be both improper and wide open to legal challenge.

Yours sincerely,



Roger Hepher
Executive Director

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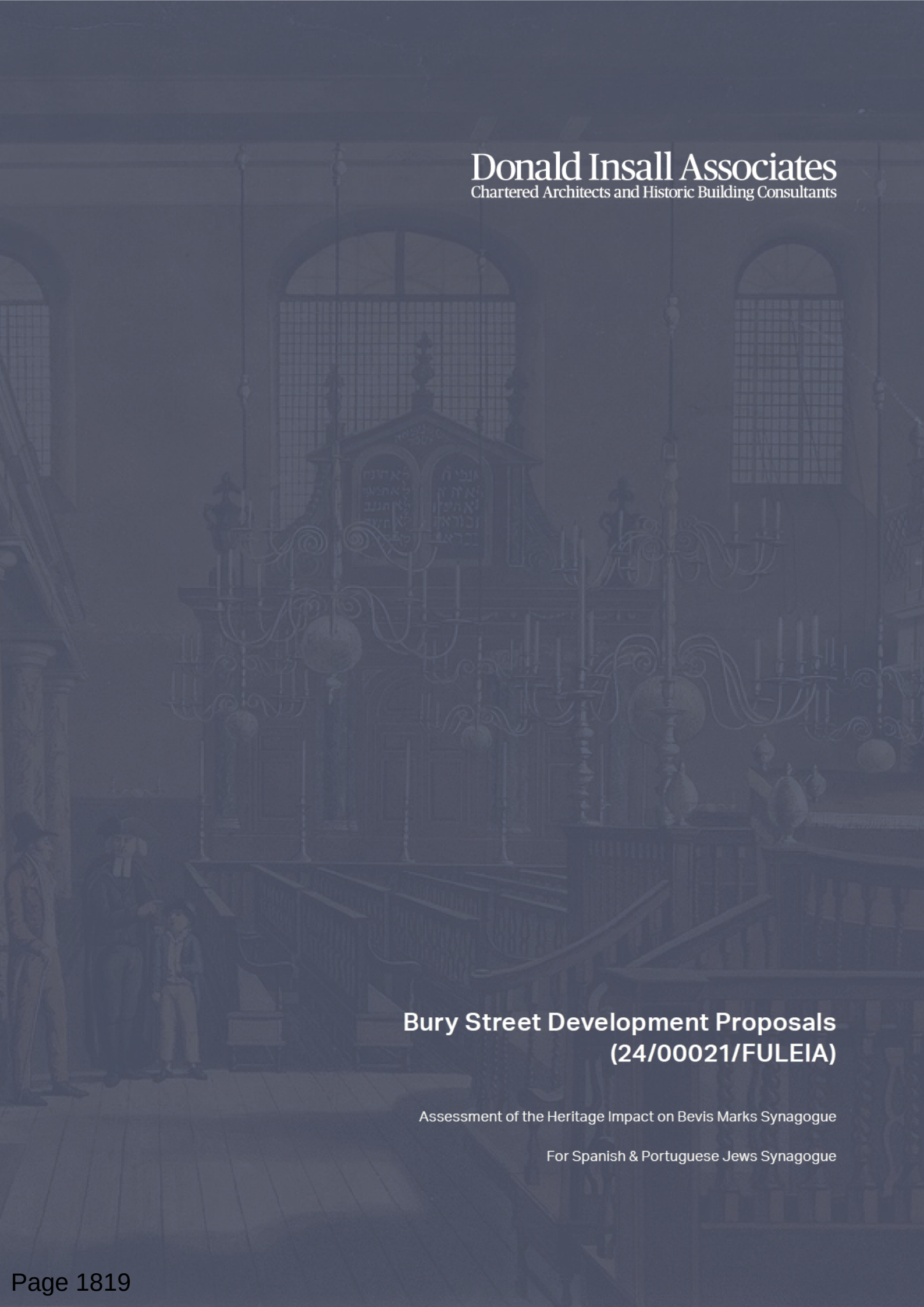
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Appendix 1 - Donald Insall Associates Heritage Assessment



Donald Insall Associates
Chartered Architects and Historic Building Consultants

Bury Street Development Proposals (24/00021/FULEIA)

Assessment of the Heritage Impact on Bevis Marks Synagogue

For Spanish & Portuguese Jews Synagogue

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1.0 Introduction

1.1 Background

Donald Insall Associates were commissioned by the Spanish & Portuguese Jews Synagogue in November 2024 to review proposals on land near Bevis Marks synagogue, namely for the demolition of Bury House and the erection of a new tall office building on the site (24/00021/FULEIA) submitted to the City of London Corporation on 8 January 2024. The proposals are currently under consideration. The site incorporates the Grade II*-listed Holland House and includes proposals for a four storey extension for this listed building (24/00011/LBC). These applications follow a scheme to replace Bury House (20/00848/FULEIA) that was refused on 22 June 2022 on the grounds of its adverse impact on the setting of Bevis Marks Synagogue and on the setting of the Tower of London World Heritage Site.

The proposed building on Bury Street is situated c. 25 metres to the south of the Grade I-listed Bevis Marks Synagogue and sits within the Creechurch Conservation Area **[plate 1]**. These heritage assets are protected by the law and national and local policy.

This short report is a professional third-party assessment of the heritage impacts of the proposals, particular the impact of the proposed development on the significance of Bevis Marks Synagogue.

The submitted applications are as follows:

24/00021/FULEIA 8 January 2024 Under Consideration

Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

RE-CONSULTATION due to the submission of additional information and revised drawings

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

RE-CONSULTATION due to the submission of additional information and revised drawings

This report sets out: the history of Bevis Marks Synagogue (in Section 2), its significance (Section 3), provides an analysis of the Bury Street scheme proposals (Section 4) and outlines the impact of the Bury Street scheme on the significance of Bevis Marks Synagogue and the Creechurch Conservation Area (Section 5).

1.2 Summary of Findings

The report finds that, in summary, the proposals for the Bury Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue.

Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as *'the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting'*[1]. This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well as its courtyard setting which frames the building and allows community and religious activities to take place.

The proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the immediate setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting.

1 https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

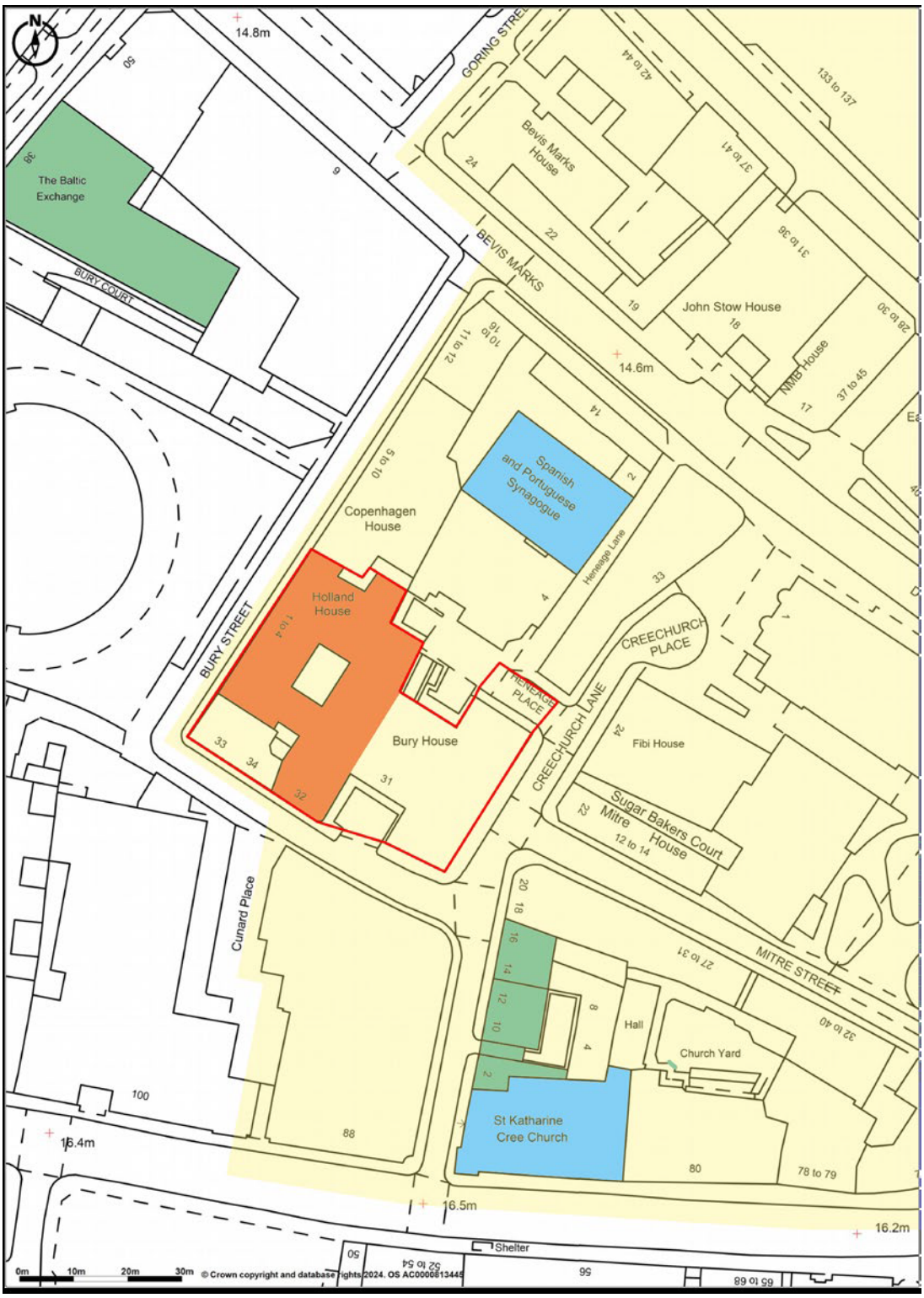


Plate 1

- Site plan of proposals under 24/00021/FULEIA
- Grade II listed
- Grade II* listed
- Grade I listed
- Creechurch Conservation Area

2.0 History of Bevis Marks Synagogue

Bevis Marks Synagogue was constructed in c. 1701 as the first purpose-built synagogue in London and followed the resettlement of Jewish communities in England in the late seventeenth century.

2.1 Re-admittance of Jews and Early Worship in Creechurch Lane

Jews were expelled from Britain in 1290 under an edict issued by Edward I. In the early seventeenth century, Jews from the Iberian peninsula (Spain and Portugal, known as 'Sephardi Jews') settled in the City having left Spain and Portugal in response to the Inquisition. Several came to England via Amsterdam, where they had also gone to escape persecution.[2] These were predominantly Jewish communities who had had to hide their religion in Spain, pretending to be Christian, and continued to do the same in England.[3] However, this community petitioned Oliver Cromwell – initially unsuccessfully – for official readmittance. A second petition, in c. 1656, appears to have received verbal assurance that 'they might meet privately for Jewish worship, acquire a burial-ground, trade as brokers on the Exchange, and enlarge their Community by bringing into England some more Sephardi (i.e. Spanish Jewish) merchants of good standing'.[4] It has been noted that this interview between Cromwell and the petitioners 'in effect, established the Jewish Community of England'.[5]

The Sephardi community first worshipped in a synagogue on Creechurch Lane, to the east of the present-day Bevis Marks Synagogue. This space was located in the upper floors of a pre-existing house and thus represented the ad hoc adaptation and alterations of a structure to the needs of the ever growing community.[6] In 1699, the Sephardi community acquired a 99-year lease of the present-day site of Bevis Marks Synagogue. The site was already occupied by a dense network of buildings fronting onto 'Berry Street', 'Beavis Lane' and Bevis Marks. These buildings backed onto a central courtyard with a central building accessed from alleys from the latter two streets, as can be seen in William Morgan's 1682 map **[plate 2]**. Under the terms of the lease, the community was permitted to demolish the existing buildings in order to construct a purpose-built synagogue along with, it appears, ancillary community buildings.

2 Sharman Kadish, *The Synagogues of Britain and London* (London: Yale University Press, 2011), 3.

3 Richard D. Barnett and Abraham Levy, *The Bevis Marks Synagogue* (Oxford: for the Society of Heshaim at University Press, 1970), 1-4.

4 Ibid.

5 Ibid.

6 Ibid., 5.



Plate 2 *Morgan Map of London, 1682 with the approximate location of the future Bevis Marks Synagogue marked and showing the tight urban grain which was demolished to make way for the Synagogue (Layers of London)*

2.2 Construction of the Synagogue

The synagogue was constructed between 1699 and 1701 under the supervision of Joseph Avis, a 'Christian master builder'.[7] Little is known about Avis and his precise role in the design of the synagogue remains obscure.[8] Avis is known to have been a 'Cittizen and Merchant Taylor of London' and worked on the Wren city church St Bride's Fleet Street, St James's Piccadilly and the Merchant Taylors' hall.[9] At the synagogue, Avis collaborated with several other craftsmen who had also worked on Wren churches and likely other City projects, situating the project within the broader building tradition of late seventeenth-century London in which the boundaries between architect, builder and craftsmen were blurred.[10]

The construction of the synagogue took place against the background of the increasing prosperity of the Sephardi Jewish community in London. Their ability to construct a purpose-built synagogue indicates the degree of social and economic security they had achieved by the late seventeenth century, giving them the funds and ability to commission a place of worship. The synagogue was built by a prosperous and growing community and within a society with fewer restrictions on Jewish worship following their readmittance to England. The choice of a builder within the establishment of British craftsmen connected to the Wren churches and broader rebuilding of the post-fire City and use of a fashionable, up-to-date architectural style demonstrates the ambition of their patronage. All of these factors mean, therefore, that Bevis Marks Synagogue can be taken in some ways as an ideal synagogue: one which was purpose-built with sufficient funds and one which could therefore respond to established Jewish law, religious practices and traditions, whilst also following current architectural practices in England.

2.3 Design of the Synagogue

While it is not within the scope of this study to delve extensively into the precedents of the architecture, much has been made of the stylistic affinities between Bevis Marks Synagogue and the Sephardi synagogue in Amsterdam, the *Esnoga*, which the Bevis Marks congregation was a daughter of and with which the early leaders of the community had close familial ties.[11] This synagogue has a comparable brick-faced exterior and equally substantial fenestration to illuminate the body of the synagogue which itself is set into a tightly built up townscape. The two synagogues also have similar internal arrangements, namely being accessed through a 'small panelled porch' that opens straight onto the prayer hall.[12] Equally, the synagogue has clear architectural affinities with the new city churches of Christopher Wren. However, it is also significant how the building responds to ideas about worship laid out in Jewish texts that would have guided those responsible for constructing the synagogue. This is dealt with extensively in Rabbi Morris' Objection Letter on Significance and

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7 The building contract for the site was signed on 12 February 1699, the foundation stone laid on 21 August 1700 and the Synagogue consecrated on 30 September 1701. Kadish, *The* Synagogues, 6-7. The attribution of the synagogue is discussed at length in the synagogue's CMP.

8 Ibid.

9 Ibid.

10 Ibid., 15.

11 Ibid., 3.

12 Ibid., 11.

Rabbi Joseph Dweck's letter appended to the HGH report (15 May 2024), both available on the planning portal. For the purposes of our analysis three elements are most important and will be discussed in detail below:

1. The setting in a private courtyard, which provided
    a. An extension of the internal Synagogue space, where religious worship could happen such as prayers on the appearance of the new moon (Kiddush Levana) which require a view of the night sky
    b. A private space that acted as a buffer between the sacred space of the synagogue and the secular outer world, an effect which was augmented through the entry into the courtyard through a narrow arched passage which opened into a wider courtyard
2. The domination of the synagogue over surrounding buildings, which accorded with Jewish tradition that enshrined that the synagogue ought to be the tallest/most prominent building in a city
3. The provision of generous natural light to the interior and views to the outside world from the interior, which responded to the requirement in the Talmud that 'a person should pray only in a house with windows' (Berakhot 34b), a requirement that had both spiritual and functional objectives.

As originally constructed, the synagogue was situated in the centre of a courtyard and seems to have been originally – or at least from an early date – surrounded by low buildings that were used for other functions of the community such as almshouses, orphanages and schools. The earliest surviving plan of these community structures is from the late-nineteenth century **[plate 3]**. The plan shows the synagogue at the heart of a wider complex of physically and organisationally interlinked structures that supported the Sephardi community in different ways. The arrangement of the synagogue at the heart of a courtyard is first shown on John Rocque's 1746 Map, which shows the rectangular 'Jews Synagogue' accessed through a narrow alley from Bevis Marks which widened into a generous U-shaped courtyard that surrounded the synagogue to the north, west and south **[plate 4]**. This linked to a subsidiary space to the south which was accessed from Heneage Lane.

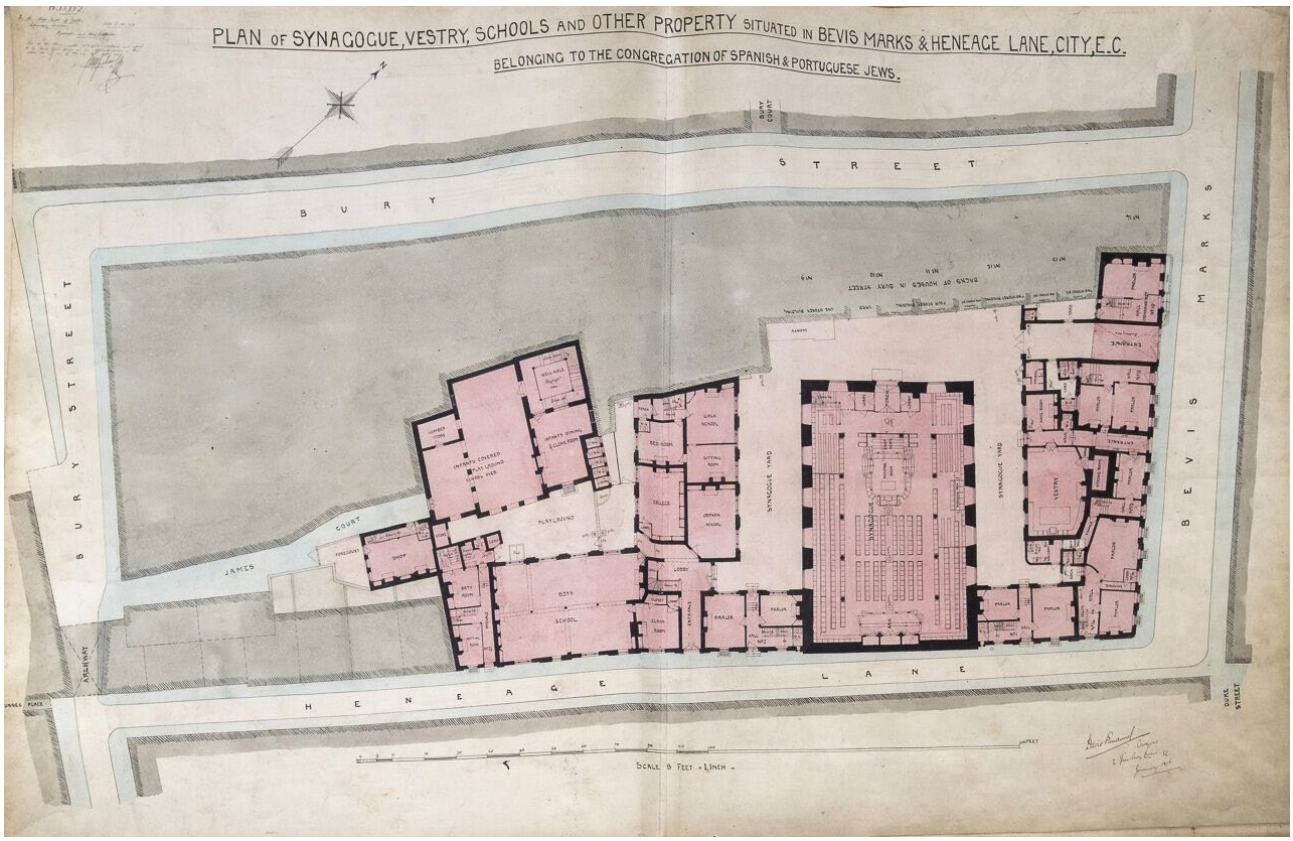


Plate 3 *Plan of Synagogue, Vestry Schools and Other Property Situated in Bevis Marks and Heneage Lane, City, E.C., belonging to the Congregation of Spanish & Portuguese Jews, 1876 (Bevis Marks Synagogue)*

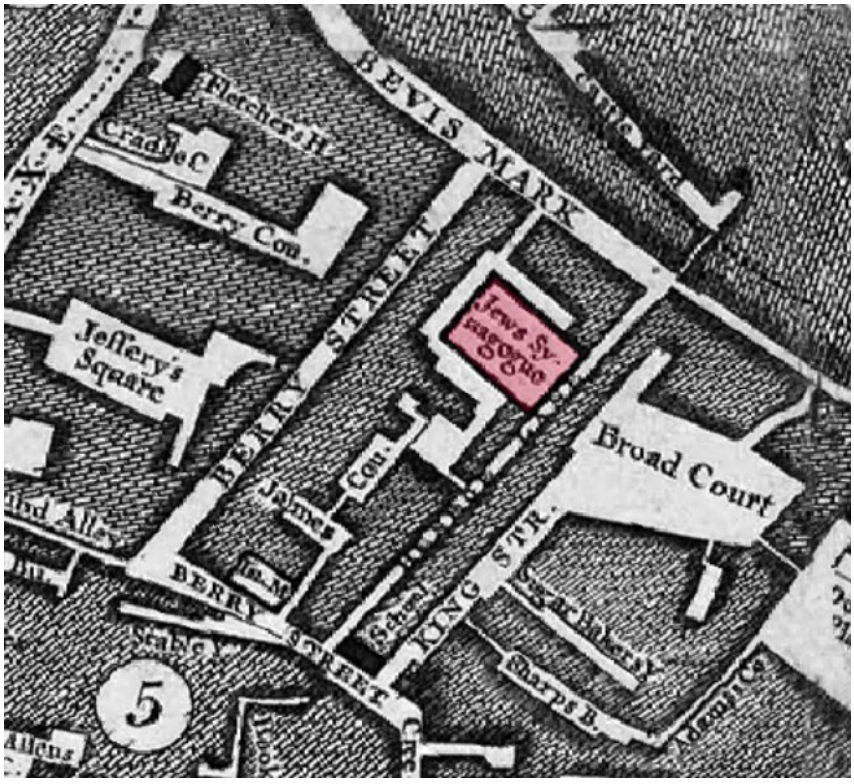


Plate 4 *Rocque Map of London Westminster and Southwark, 1746. Note the presence of the U-shaped courtyard around the Synagogue (Layers of London)*

The courtyard appears to have always been considered a central space of the synagogue with early references to it being paved in free stone and a stone mason recorded as having paved the courtyard.[13] The explicit reference to the treatment of the courtyard in early documentation makes clear that this was conceived as part of the commission for the synagogue itself and was intended to be closely linked to the synagogue's architectural impact and religious function. Moreover, it has been noted that in typical synagogue architecture, a vestibule separates the street from the prayer hall. In the Sephardic tradition, however, the vestibule did not develop as part of the building typology, in part following the model of the Esnoga, the Sephardi synagogue in Amsterdam.[14] In these buildings 'the lack of vestibule' is compensated for 'by the existence of a courtyard'; hence, the courtyard was seen as an extension of the building itself.[15] While it has been suggested that the location of the synagogue within the courtyard was because of restrictions placed on the construction of synagogues on high streets, its position clearly had significance for the liturgical function of the building itself.[16]

This arrangement – of the synagogue in a courtyard surrounded by community buildings – was maintained throughout the eighteenth and nineteenth centuries and is shown on the Goad map of 1887. This shows how the synagogue related to neighbouring buildings and highlights that, despite the presence of larger warehouses to the synagogue's west, many of the surrounding structures were still low-rise [plate 5].



Plate 5 *Goad Map, 1887. Note that several surrounding buildings were still in use by the Sephardic Community and that most buildings were still of a modest scale (Layers of London)*

13 Ibid., 6.

14 Ibid., 10-12.

15 Ibid.

16 Ibid., 5.

The exterior of the synagogue is shown in a contemporary print which shows the synagogue rising above the surrounding buildings **[plate 6]**. The view in the print shows the building from the northeast, the angle that the visitor or worshipper first perceives when entering the private courtyard through the arched entrance on the public street, Bevis Marks. From this angle, the building clearly was intended to dominate over its surrounding structures.

The form of the building itself was informed by the religious needs of the community. It was dominated on the interior and exterior by large multi-pane windows. On the north and south elevations, there were smaller windows that lit the ground floor and larger round headed windows at the level of the internal gallery. Windows on the eastern side were elevated above the Arc and on the western side, above the entrance porch. Early images emphasise that the space was configured to be flooded with light, which served both spiritual purposes and functional purposes as it provided light for people to read prayers. These images include an early nineteenth-century print which shows the play of light and shadow across the floor **[plate 7]**, an 1884 watercolour that shows the even lighting achieved due to the generous windows on all sides **[plate 8]** and a late nineteenth-century print which literally renders the beams of light emanating from above through the southern windows, casting light onto the Arc and seats which would house the congregation during services **[plate 9]**. The images make clear, as is still the case in the synagogue today, that the space was dominated by these large, clear windows. Besides the light from the windows, the interior was historically lit by seven chandeliers. These chandeliers are, today, fairly inaccessible and take an hour to light and an hour to extinguish by hand. It could be presumed that they were predominantly used at night and that the interior was light enough for worship during the day without the aid of artificial light.

Not only was the provision of light important, views of the outside world were also important in Jewish worship. As is outlined in Rabbi Morris' report on the setting of the synagogue, also available on the planning portal, views of the outside were significant because of the importance of knowing the time of day, traditionally understood through views of the sun and night sky, to instigating Jewish prayer. In particular, the appearance of stars in the night sky traditionally was used to demarcate the end of the Sabbath, whilst the passage of the sun in the daytime was used to indicate times for prayer and worship. The large and multiple windows in the synagogue, then, both permitted views to the outside world that permitted the demarcation of the passage of time and thus the call to prayer as well as serving a functional purpose of lighting the interior.

While elements of the fabric of the interior and exterior have been renewed – namely the pane glass and the paving to the courtyard – the overall configuration of the building envelope and much of the courtyard have remained the same, reflecting the enduring use by the same community of Sephardi Jews who built the synagogue over 300 years ago.[17]

17 The Synagogue's Conservation Management Plan discusses alterations in detail.

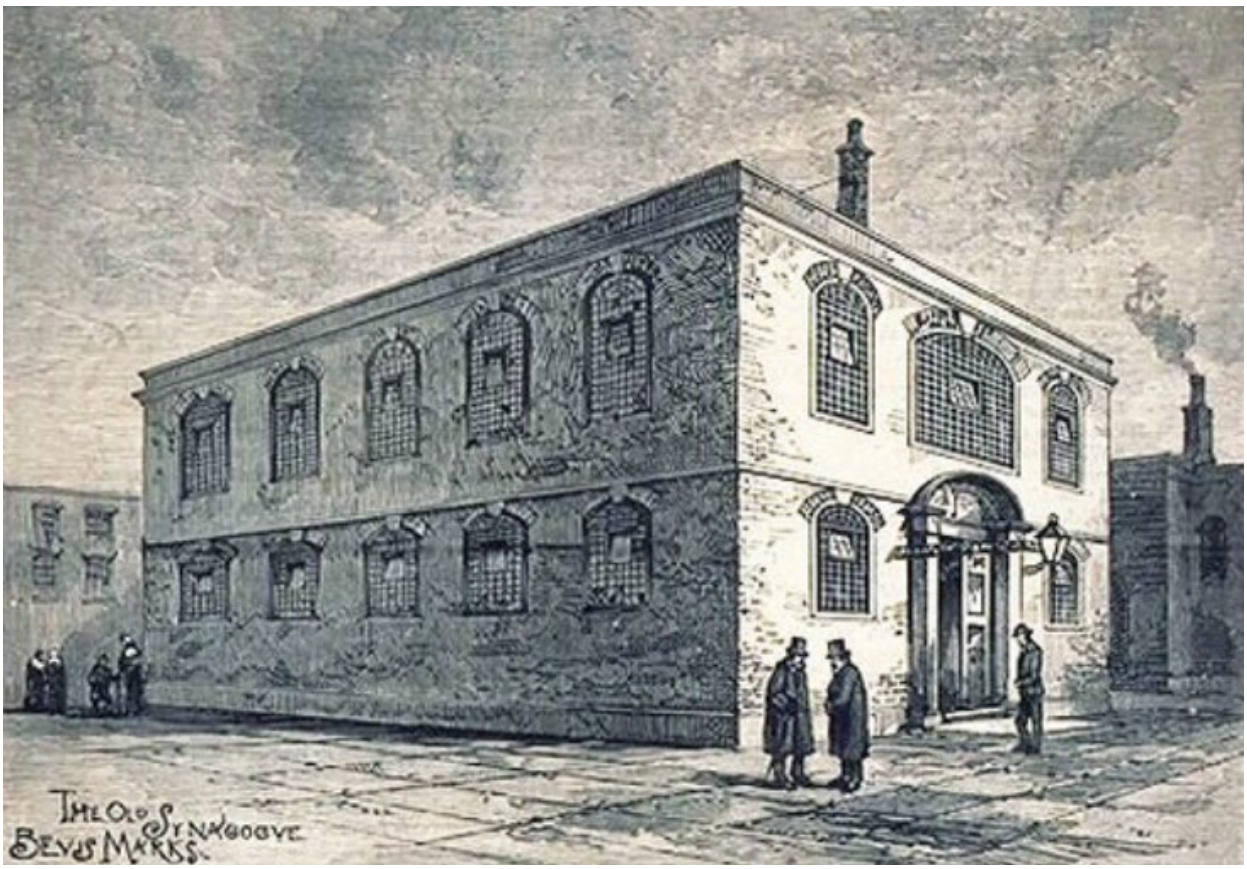


Plate 6 *View of Bevis Marks Synagogue from the northwest in 1891, showing the Synagogue's original setting in an open courtyard with low ancillary buildings to its south and east (Bevis Marks Synagogue)*



Plate 7 *Print after Belisario of the interior of Bevis Marks Synagogue showing two visitors. Note the play of light on the floor (MeisterDrucke)*

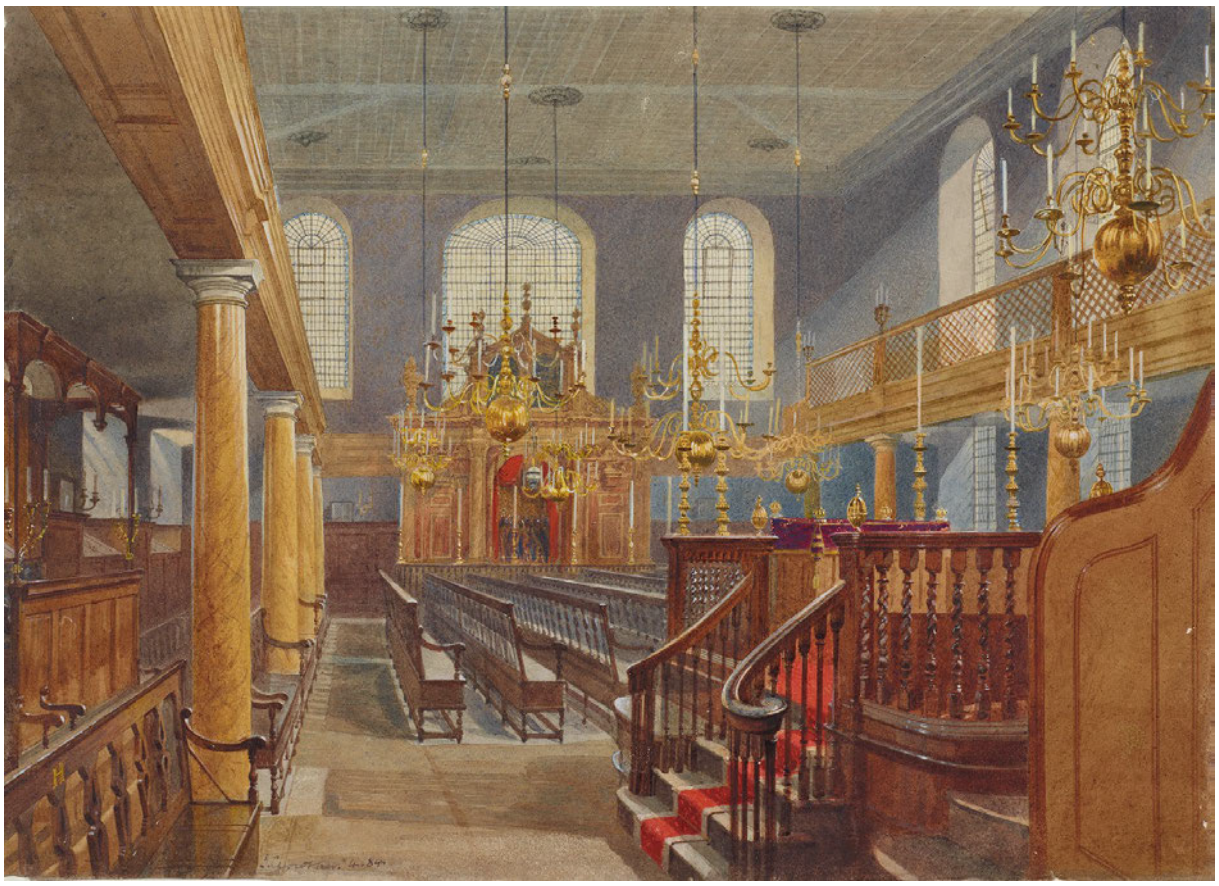


Plate 8 *Watercolour of the interior of Bevis Marks Synagogue, 1884. Note the even light cast through the windows and the importance of the bright light coming through the windows to the appearance of the space (LPA)*

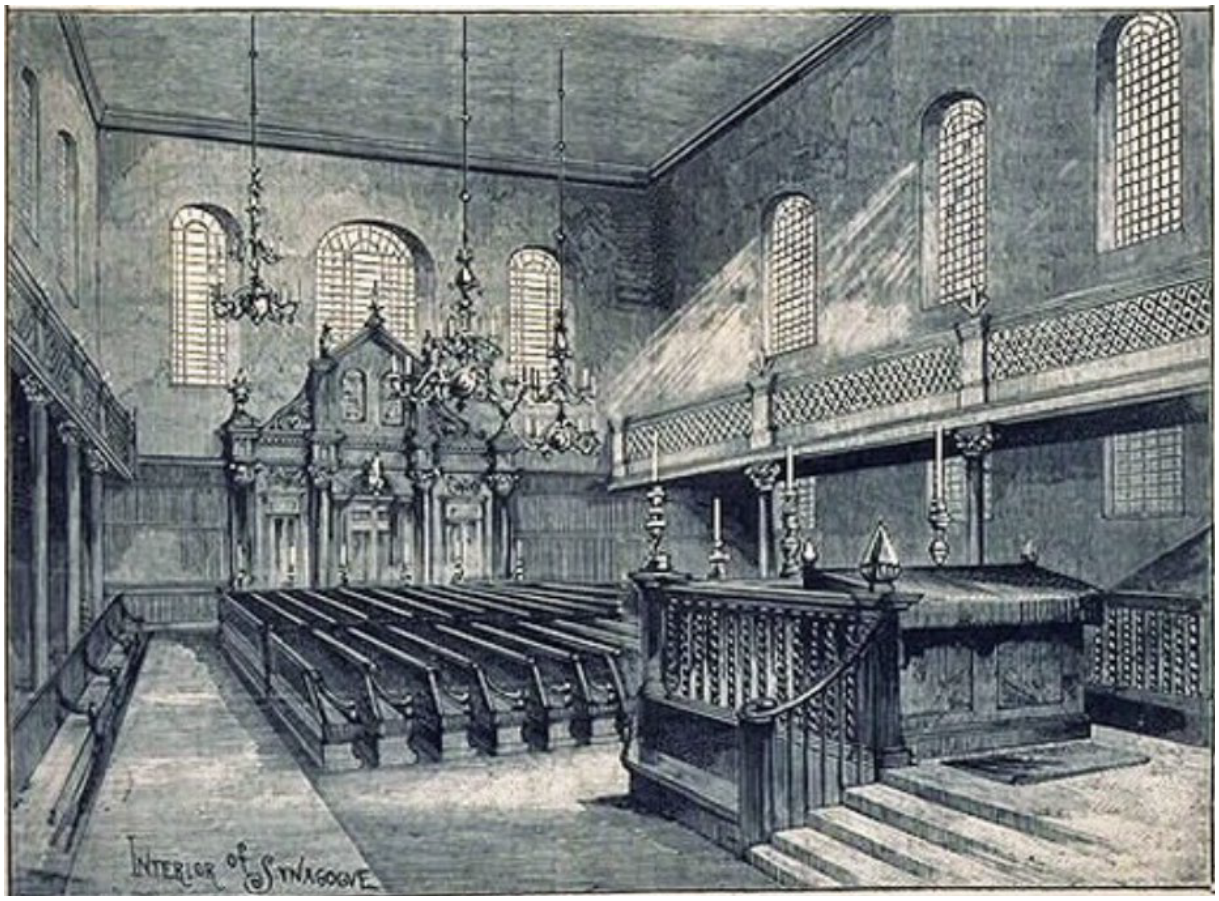


Plate 9 *Print of the interior of Bevis Marks Synagogue in 1891, with emphasis placed on light streaming in through the southern windows (Bevis Marks Synagogue)*

2.4 Later Changes to the Synagogue's Setting

The wider setting of the synagogue has evolved, firstly in the late nineteenth century when it itself was threatened by demolition in 1886.[18] This ultimately led to the demolition of some of the surrounding buildings and their replacement with new structures, such as the houses and offices that flank the synagogue on its eastern side and open onto Heneage Lane. Comparison of the OS Town Plan from 1896 **[plate 10]** and that from 1916 **[plate 11]** shows the infilling of the open space to the rear of some of the buildings to the west of the synagogue thus creating a solid wall to the south of the synagogue as well as broader redevelopment in the area such as the replacement of small blocks on Bury Street with the larger Holland House.

The setting has continued to evolve through piecemeal redevelopment of neighbouring plots over the course of the twentieth and twenty first centuries. Except for the Victorian buildings that flank the synagogue on the eastern side, the courtyard is now entirely surrounded by relatively modern buildings. However, these buildings remain of a fairly modest scale, despite being taller than the synagogue. This means that they still permit views to the sky and do not feel overbearing. It is notable that the buildings that form the southern side of the courtyard seem to have been intentionally designed to respond to the height of the synagogue **[plate 12]**. While both are taller than the synagogue, they have clearly delineated lower storeys and mansard roofs. The cornice line of the lower storeys is similar to the height of the synagogue, especially when seen from an oblique angle, and the mansard roofs are sloped away from the synagogue, thereby allowing the synagogue to still feel as if it is the dominant building in the courtyard. To the immediate south of the synagogue, the courtyard was infilled in the twentieth century with a glazed structure which has since been replaced with a single-storey visitors' centre and museum for the synagogue, due to be completed in 2025.

In the wider settings, there are tall buildings to the south constructed in recent years which are visible from the courtyard. These include 40 Leadenhall and 52-54 Lime Street. Because they are further from the site than the proposed Bury Street tall building, their impact on its setting is more limited and there is still sky seen between them and a sense of distance maintained between these buildings and the courtyard. There are also modern tall buildings to the east and west of the synagogue.

So, in summary, the synagogue represents a purpose-built religious building that articulated the aspirations of the burgeoning Sephardi Jewish community in the late seventeenth and early eighteenth centuries and which can be understood as an ideal synagogue structure due to its correlation to statute in Jewish texts. The form of the synagogue and courtyard were fundamentally related to its use as a synagogue in the period of its construction and in the subsequent centuries to the present day, and its open courtyard with sky views forms an intrinsic part of the significance of the synagogue, both spatially and functionally.

18 Barnett and Levy, *The Bevis Marks Synagogue*, 9.

3.0 Assessment of Significance of Bevis Marks Synagogue and its Setting

3.1 Policy Context

The purpose of this section is to provide an assessment of significance of Bevis Marks Synagogue in order to evaluate the impact of the proposals for a new tall building on Bury Street on that significance in section 5.

This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as:

> *'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.*

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment. It provides relevant guidance as to how to assess the significance and setting of a heritage asset. On significance the PPG says:

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- ***archaeological interest**: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- ***architectural and artistic interest**: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*

- ***historic interest****: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

And on setting:

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

3.2 Assessment of Significance of Bevis Marks Synagogue

Bevis Marks Synagogue is a Grade I-listed building located within the Creechurch Conservation Area. It was constructed between 1699 and 1701 as the first purpose-built synagogue of the Sephardi Jewish community in England and has been in continuous use as a synagogue by the community since. The building is rectangular and constructed of brick, with generous multi-paned windows on all four sides, informed by the church architecture of Sir Christopher Wren and the architecture of the Sephardi *Esnoga* in Amsterdam which had strong links to the London Sephardi community in the seventeenth century. It is situated within a courtyard accessed from Bevis Marks and its rear elevation fronts onto Heneage Lane.

As a Grade I-listed building, Bevis Marks Synagogue has been recognised to have an **exceptional**[19] **degree of architectural and historical interest and significance**. Its historical interest lies in its status as the oldest purpose-built synagogue in Britain in continuous use. The building's historical and architectural interests are closely intertwined. As discussed in section 2, there are three elements of the synagogue that were likely informed by the functional and liturgical needs of the congregation, when first constructed, namely:

- its setting within a private, open courtyard with sky views which formed a spatial and functional extension to the interior of the synagogue,
- the domination of the synagogue over its surroundings,
- and the provision of ample natural light to the interior which had liturgical and functional importance.

These needs dictated the form that the building took and its situation in a generous courtyard. Internally, the provision of large multi-paned clear plate glass windows, opening onto the courtyard and unobstructed by surrounding buildings, defined the spatial quality of interior, making it feel like a light, open space connected to the outside world. These elements related closely to the historical uses of the building.

The building survives largely intact both internally and externally, with these key features still well-represented, if somewhat obscured by encroaching development. Whilst there have been alterations, such as the introduction of some artificial light in the 1920s, likely in part to alleviate the task of lighting and extinguishing the chandeliers which takes several hours, the configuration of the structure has remained legible. As such, the original function of the building is manifest in its fabric and form and this allows us to understand how the space was used historically. Hence, architectural and historic significance of the building is **exceptional** as it illustrates how Sephardi Jewish communities have worshipped in Britain for the past 300 years in a building of high quality.

Moreover, the building remains in use by the community for whom it was constructed and this continuing use by the Spanish and Portuguese Sephardi Jewish community forms an inherent part of its significance. Historic England, the government's statutory advisor for heritage matters, provides guidance on how such elements of significance should be assessed in *Conservation Principles* (2008). It describes 'communal

19 Definitions of statutory listing grades are provided here: https://assets.publishing.service.gov.uk/media/5beef3c9e5274a2b0b4267e0/Revised_Principles_of_Selection_2018.pdf

value' as a tool for assessing significance, which includes social value ('associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence') and spiritual value which is defined as:

> *59. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.*
> *60. Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.*

In the case of Bevis Marks Synagogue, these criteria are central to understanding the significance of the building. The building's exceptional special interest and significance resides primarily in its status as the UK's oldest synagogue, the UK's first purpose-built synagogue and its continuing use as a synagogue for the same community who built it, those for whom it has social, communal and spiritual value. The contribution of the **use** of the building to its significance, then, is of **exceptional** importance. The enduring relationship between the fabric of the building and the functioning of the community is essential to its significance.

The building's **setting**, in particular, its courtyard, but also its wider setting visible from the building and the courtyard, make a **very strong contribution** to its significance and speak to the building's historic function, architectural interest and present-day use. The courtyard outside the building has been its setting since it was constructed and it seems evident that it was specifically conceived to have functional and liturgical purposes. The building's setting in this enclosed courtyard maintains the historic setting of the building and therefore contributes strongly to its **historic and architectural interest.** The courtyard afforded the synagogue a high degree of privacy, which was important to its historic use.

Not only is the courtyard the space from which the synagogue is meant to be seen, it also was conceived to ensure the provision of light into the interior of the synagogue and to form an external extension of the building in which services could take place. These services and the provision of light were predicated on the relationship to the broader setting. This is recognised to be an element of setting protected by the law, as explained in NPPG (2019), which states that '*the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*' Environmental factors can be taken to include light and landscape, which includes the sky, and, in the case of the synagogue, these are factors that contribute strongly to the building's significance. The relationship between the building and its surrounding environment, namely retained sky views which have liturgical and functional importance, are an important part of its significance. That these were recognised by the original community who used the synagogue is perhaps made evident by the synagogue's name, 'the Gate of Heaven', which could be taken symbolically to gesture towards the relationship between the building

and the sky above The importance of this sky view for the practising community today is paramount, because the courtyard is a space of arrival, prayer and community gatherings. While the synagogue's setting has been negatively impacted by the construction of towers to its south and west, it still retains a sense of open-ness, in large part because these towers are set back from the site and do not dominate its setting.

The synagogue's setting, then, is defined by both its physical relationship to its historic courtyard and immediate surrounding low-rise buildings, but also by its relationship to its broader environment which includes elements of the natural environment experienced by the viewer and worshipper on site, including the sky views and natural light.

It should be noted that the draft City of London Local Plan 2040, currently under inspection, has attempted to define the 'immediate setting' of Bevis Marks synagogue in a policy map (figure 27). The synagogue's 'immediate setting' is referenced in Strategic Policy S21: City Cluster and Policy HE1:Managing Change in the Historic Environment. The Plan identifies solely the blocks immediately abutting the synagogue's courtyard as the 'immediate setting' of the building (thereby excluding Bury House and the sites of other towers to the south of the Synagogue). This assessment has already been challenged by Historic England as well as the synagogue and it is important to note that the wider setting, not just the buildings abutting a listed building, is considered part of the setting of a building as assessed in policy.[20]

In summary, the building is of **exceptional national significance**, significance which is derived from **architectural and historical interest, communal value** and **the building's setting.**

20 Historic England's comments on the 'immediate setting' proposal contained in HE1 and S21 are in LD8 Consultation Statement Appendix 9 (https://www.cityoflondon.gov.uk/assets/Services-Environment/LD8-Appendix-9-City-Plan-2040-Regulation-19-Consultation-Responses.xlsx).

4.0 Bury Street Proposals

The proposals contained within application 24/00021/FULEIA cover the site of Bury House, Holland House and Renown House, located between Bury Street to the west, Bury Street to the south, Creechurch Lane to the east and Valiant House to the north. The proposals, designed by Stiff + Trevillion, seek to demolish Bury House, a post-war office building, and replace it with a new tall building which would consist of 4 basement levels, ground floor and 43 storeys. It is proposed that the new tall building which would have facades comprised of rows of rectangular windows and be clad in terracotta tiles between the PPC glazed windows. The site of the new tall buildings is about 25 metres to the south of Bevis Marks Synagogue.

The proposals also seek to make alterations to Holland House and Renown House which involve partial demolition and the construction of extensions. For the Grade II*-listed Holland House, which is also subject to a listed building consent application (24/00011/LBC), it is proposed to *inter alia* add a four-storey extension. This restoration includes the 'removal and reinstatement of external faience', reopening a historic entrance on Bury and, in part, also refers to internal demolition which is proposed of features identified as later alterations, as well as the removal of other modern interventions. Demolition to facilitate interconnection between the three buildings is also proposed as well as other internal alterations. A three-storey extension is proposed for Renown House which is an unlisted historic building.

The project's Design and Access Statement summarises the benefits proposed by this scheme. These include: the provision of a floor of affordable workspace in Holland House, the creation of routes including the extension of Heneage Lane, creation of further active frontage, and new public space, and heritage benefits which entail the repair and restoration of Holland House and the unlisted Renown House. The DAS additionally highlights the sustainability, biodiversity, delivery and transportation, SME and economic provisions of the project.

5.0 Impact of the Bury Street proposals on the significance of Bevis Marks Synagogue, its setting and the Creechurch Conservation Area

5.1 Impact of the Proposals on the Significance of Bevis Marks Synagogue

The proposed scheme for the construction of a 43-storey tall building on Bury Street would have an adverse impact on the significance, including setting, of the Bevis Marks Synagogue.

Several grounds for heritage objections to the scheme have been raised by Historic England and other statutory bodies and other objectors. The report produced by Alex Forshaw and appended to HGH's objection letter outlines the impact of the scheme on the setting and significance of various designated and non-designated heritage assets, including, notably the Grade II*-listed Holland House to which proposed extensions would cause harm. We concur that the proposals for a 4-storey extension to Holland House would create harm to its significance because of the considerable extent of the proposed roof extension set above the building's fine street frontage.

This report deals primarily with the impact on the setting of Bevis Marks Synagogue and how this impact would affect the significance of Bevis Marks Synagogue.

As identified in section 3, the synagogue's significance lies in its exceptional historic and architectural special interest as the first purpose-built synagogue in Britain and one which is largely still intact and thus reflects the historic worship practices of the Congregation, in its continued use by the community and in its setting which was central to the functional and liturgical uses of the building historically and in the present day. As we identified in section 3, in accordance with the NPPG, the setting of the synagogue is not formed solely by the buildings immediately abutting its courtyard, but rather encompasses a wider environment which includes the light conditions and views to the sky and the moon, currently present on the site. The HTVIA provided by the applicant incorrectly identifies the setting as limited to the courtyard, writing that *'the contribution that setting makes to the heritage significance of Bevis Marks Synagogue is very localized, and the wider setting, beyond Heneage Lane and the courtyard, where the Site lies, does not contribute to this significance.'* This assessment does not take into account all available information about how the setting relates to the building's use and significance.

Indeed, the assessment of the setting provided in the refusal of the previous application for a tall building on the site – which was not substantially different to the current proposal – acknowledged that the building's setting is wider than the immediate courtyard. The refusal letter states:

1. *The development would adversely affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue*.

In the case of this application, the proposed benefits did not outweigh the public benefits of the proposals and thus ran contract to Local Plan and London Plan policies. So, it has been previously acknowledged that the setting contributes to the significance of the building, as we have also found in this report.

The proposed scheme would impact on the historic and architectural significance of the synagogue, its setting and its use, principally through overshadowing. The new tall building would:

1. Impact the setting of the synagogue which was historically characterised as open to the sky, a characteristic which has survived, albeit in slightly lesser form due to some new, taller buildings in the vicinity, to the present day. The openness to the sky is important to the courtyard as it communicates that it was intended to be a space of worship, particularly in relation to the moon (and would therefore be harmed by the tall building blocking views of the moon), and a space for communal gatherings which would be compromised by the additional overlooking and the overbearing character of a very tall building in close proximity;
2. Provide a new backdrop to the synagogue and harm its architectural interest, as tall building would be very close and out of scale to the buildings fronting the courtyard and the synagogue itself, as the synagogue was intended to be dominant in its setting, responding to Jewish religious law;
3. Impact the provision of natural light and views to the sky from inside the synagogue which may compromise the continued use of the synagogue by its community and would reduce the building's functionality by reducing the usable space.

These amount, cumulatively, to serious harm to the heritage asset's significance.

National legislation and policy impose duties upon local planning authorities to consider the impacts of proposals upon listed buildings and conservation areas.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision making on applications that relate to the historic environment. Section 66 of the Act imposes a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and their settings. It states that:

> *In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

The National Planning Policy Framework (NPPF) (December 2023) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF requires that, with regards to the significance of a heritage asset:

> *201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

Local planning authorities are required to take into account *'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation'* (paragraph 203) in determining applications. Should a proposal cause harm to the significance of a designated heritage asset, the Local Planning Authority is required to give *'great weight'* to *'the asset's conservation (and the more important the asset, the greater the weight should be)'* (paragraph 205). The NPPF continues to note that harm to a designated heritage asset must be justified:

> *'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.'* (paragraph 206).

So, national legislation and policy requires that decision makers consider the impact of proposals on the significance of surrounding heritage assets; it is evident that the impact of the Bury Street proposals on the Grade I-listed Bevis Marks Synagogue's architectural and historic significance through the impacts on its setting, therefore, must be considered fully by the City of London Corporation and inform the determination of the application.

There is genuine concern amongst the community that uses Bevis Marks Synagogue that the harm to the setting and interior of the synagogue that would be caused by the approval of this tall building could lead to the synagogue no longer being a suitable and functional space of worship, as certain rituals could not be performed, such as the prayer said to the waxing moon, and as parts of the interior would be plunged into darkness, making difficult or even preventing their use by the Congregation. Were the Congregation to leave the synagogue, this would impact greatly the significance of the structure, which, as we have discussed above, is closely tied to its status as the oldest purpose-built synagogue in the UK and its continued use by the Sephardi community. In turn, the long term conservation of the building would be put at risk. These are impacts to the listed building that the City Corporation should also take into consideration when determining this application.

As discussed above, legislation and national policy requires that Local Planning Authorities take into consideration the impact of proposals on the significance and setting of heritage assets. Local and Neighbourhood Plans are the means through which Local Planning Authorities articulate how they will apply national policy to local situations and refine the requirements put in place by central government. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The London Plan (March 2021) and City of London Local Plan (January 2015) have policies which are relevant to the issues at hand.

The London Plan's Policy HC1 Heritage conservation and growth requires that

> *'(C) Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process'.*

Also relevant to the proposals is the London Plan's Policy D9 Tall buildings which states that

> *'(d) proposals [for tall buildings] should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.*

The City of London's Plan (January 2015) similarly protects the setting and significance of heritage assets.
Core Strategy Policy CS12: Historic Environment states the need

> *'to conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors, by:*
>
> 1. *Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses [...]'*

Policy DM 12.1 relates to the need to manage change affecting all heritage assets and spaces and states the desire

1. *To sustain and enhance heritage assets, their settings and significance.*
2. *Development proposals [...] that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development [...]*
3. *[...]*
4. *Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.'*

It is essential, then, that the decision makers, in line with national and local policies, evaluate the impact that the proposals for the tall building on Bury Street would have on the setting and, in turn, the significance of Bevis Marks Synagogue.

Based on our analysis, we believe that these proposals would cause serious harm to the Grade I listed heritage asset, and therefore, require that the harm be outweighed by the public benefits put forward by the scheme. The public benefits of the scheme, however, in our view fall short of outweighing the serious harm to the synagogue.

Following the NPPF, 'great weight' must be given to the conservation of the Grade I listed building. These proposals would fail to do so. Instead, they would adversely impact the setting and its contribution to the significance of the synagogue, and cause harm the architectural and historical interest of the building, and thus the proposals, as they stand, threaten the building's conservation.

5.2 Impact of the Proposals on the Creechurch Conservation Area

The proposed development would also impact the character and appearance of the Creechurch Conservation Area which was designated in 2024. The Conservation Area Character Summary and Management Strategy is currently under preparation by the City Corporation.[21]

The area is characterised by predominantly mid-rise buildings and is dominated by historic buildings and street patterns; the Creechurch Conservation Area Proposal identifies, in particular, the late nineteenth century warehouses on Creechurch Lane and Mitre Street, the Edwardian Aldgate School, the three religious buildings (most importantly Bevis Marks Synagogue) and several open spaces as defining the area's character and appearance, which is also notable for its association with the history of Jewish communities in Britain.

The legislation and policy discussed above also have requirements for the decision makers when dealing with development within conservation areas.

Section 72(I) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

> *[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.*

A Conservation Area constitutes a designated heritage asset in its own right and therefore the policies discussed above in the NPPF are also relevant here and the Local Planning Authority must give '*great weight'* to '*the asset's conservation*'.

However, the NPPF does also state in paragraph 213 that:

> *Not all elements of a Conservation Area or World Heritage Site 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 or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

Hence the loss of Bury House, which does not contribute to the Conservation Area, is not in itself problematic. However, the impact of the replacement building is.

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21 Creechurch Conservation Area - City of London

The City of London Local Plan (January 2015) states in Policy DM 12.2 Development in conservation areas that *'1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.'*

In Core Strategic Policy CS14: Tall Buildings the conditions in which a tall building will be acceptable or unacceptable are stated:

> *'To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhancing the skyline and provide a high quality public realm at ground level, by:*
>
> 1. *Permitting tall buildings on suitable sites within the City's Eastern Cluster.*
> 2. *Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and monument views and setting, as defined on the Policies Map.*
> 3. *Elsewhere in the City, planning proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of the heritage assets and their settings; and the effect on historic skyline features.'*

While the site of Bury House is located within the City's Eastern Cluster, the site is clearly not a 'suitable' one due to its proximity to Bevis Marks Synagogue and the impact of the proposals on its setting and significance. Moreover, the policy explicitly states that planning permission will be refused in conservation areas making this a doubly inappropriate site for the construction of a tall building.

The draft City Plan 2040 is being prepared for examination by the Planning Inspector on behalf of the Secretary of State. The Draft Plan's Strategic Policy S12: Tall Buildings removes the presumption of refusal for tall buildings in Conservation Areas, though there remains the requirement that *'8. Tall buildings must have regard to: [...] c. the significance of heritage assets and their immediate and wider settings.'* This policy remains in draft and has attracted significant objection from inter alia Historic England. Therefore, the current Plan's policy against tall buildings in conservation areas must be followed, which would require this application to be refused. However, even if one applied the draft policy to which little weight can be attached at present, it seems evident that the proposed building does not have due regard to the significance of the Grade I listed Bevis Marks Synagogue.

5.3 Conclusion

In summary, we find the proposals for the construction of a 43-storey tall building to replace Bury House cause serious harm to the exceptional special interest of the Grade I-listed Bevis Marks Synagogue. The NPPF requires that 'great weight' is given by decision makers to the conservation of the Grade I listed building, and that schemes that would cause harm to such a structure could only be granted consent in the situation in which clear and convincing justification has been provided, and where public benefits outweigh such harm. In the case of the impact on the synagogue, the heritage harm is serious, and would affect both the immediate and long term functioning of the synagogue, and may compromise the future use of the building which is an important part of its significance. The proposals do not show evidence of having given great weight to the conservation of the significance of Bevis Marks, nor do they appear justified, or outweighed by public benefits, and therefore do not apparently accord with the heritage policies set down in the NPPF, nor those in the local plan which in its current iteration does not allow for tall buildings in conservation areas. These concerns are also set out in Historic England's response to the current application, and mirrored in many objections to the scheme.

It is our professional view that the proposals fall short of the national and local policy requirements for designated heritage assets.

Appendix I - Statutory List Description

Synagogue, Bevis Marks EC3

Heritage Category: Listed Building
Grade: I
List Entry Number: 1064745
Date first listed: 04-Jan-1950
Date of most recent amendment: 10-Nov-1977

Details
BEVIS MARKS EC3 1. 5002 (South Side) Synagogue (Formerly listed as Synagogue of Spanish and Portuguese Jews, No 4 Heneage Lane)

TQ 3381 SW 11/363 4.1.50.
I
2. 1701. Plain, rectangular building of red brick with modest dressings of Portland stone. 2 tiers of windows, segmentally arched below and round-arched above, with semi-elliptical heads to larger, central openings in east and west elevations. Simple cornice and parapet. West doorway with segmental pediment on consoles and lamp on decorative iron bracket. Plain interior with gallery supported on Doric columns to 3 sides. Ceiling altered apparently in C19. Fittings remarkably complete and little altered from original arrangement, some being older than present building. They include wainscot, benches, railings, very finely carved echal or reredos, and 7 large brass chandeliers. This was the 2nd synagogue erected in England after the resettlement of 1656 and in its little altered state is of exceptional historic interest.

Listing NGR: TQ3339581257

Holland House, 1-4 and 32, Bury Street EC3

Heritage Category: Listed Building
Grade: II*
List Entry Number: 1064724
Date first listed: 05-Jun-1972
Date of most recent amendment: 29-Sep-1997

Details

TQ 3181 SW 627-0/11/362
BURY STREET Nos.1-4 and 32 (Holland House)
05/06/72
II* 1914, by Berlage. No 32 has narrow frontage with short return to east. Nos 1 to 4 form a long, separate frontage, connected at rear. Six storeys, Nos 1 and 2 set back. Polished black marble to base, doorways etc. Upper faced with faience: pronounced vertical ribs with sunk panels beneath windows and pierced parapet. Entrance to No 32 now blocked: carved corner feature with stylised prow of ship. Main entrance has wall decoration in glazed brick and tile and panels of mosaic to beamed ceiling. Rear of premises rebuilt to greater height.

Listing NGR: TQ3334881228

Donald Insall Associates

Appendix 2 - Bevis Marks Synagogue Setting Study

the S&P SEPHARDI community Bevis Marks

Planning application ref. 24/00021/FULEIA; proposed 43 storey tower at 31 Bury Street

Bevis Marks Synagogue in Judaism and Heritage: A Setting Study With Perspectives from Jewish Sources

20 November 2024

Rabbi Shalom Morris
Rabbi, Bevis Marks Synagogue
PhD Candidate, King's College London, Dept of History

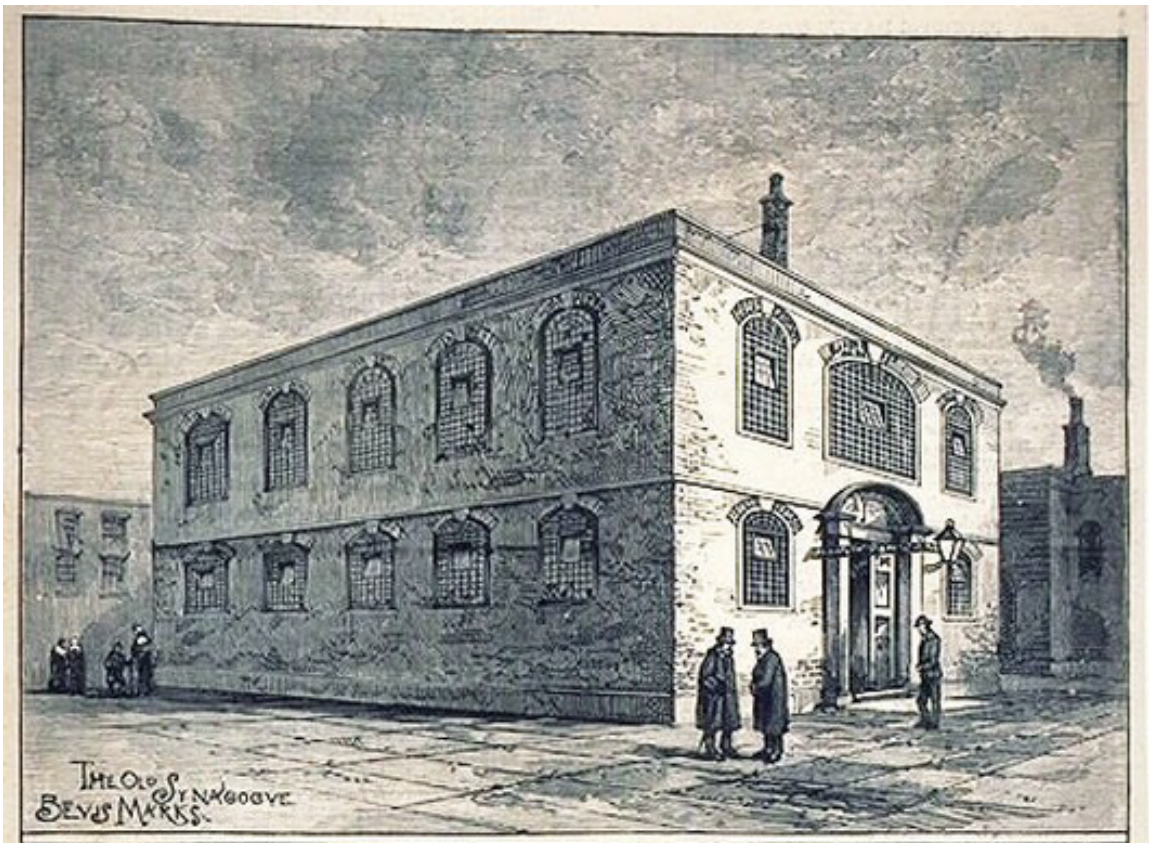


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Chapter 1 - Introduction: Harm and Significance

One of the the most important elements of the significance of Bevis Marks Synagogue is the interplay between the historic building, its setting, and the community who have always worshiped there. However, the setting of the synagogue, its architectural purity, and the ability of its community to continue to use it for worship are at risk due to tall development to its south, notably at 31 Bury St.

As the original custodians of Bevis Marks Synagogue, we hope this paper will sufficiently explain elements of the synagogue's significance that are at risk due to developments that infringe on its remaining southern sky-view. It is our contention that this space must be protected at all costs to ensure the continuing significance, including functioning, of Bevis Marks Synagogue. In this sense, this is an existential matter both for the synagogue's future wellbeing, and for the Jewish community's continuing presence in the City of London, a place they have called home since the Resettlement of Anglo-Jewry began in 1656.

A. Significant Harm to Bevis Marks Synagogue

Grade-1 Listed Bevis Marks Synagogue is the UK's most historically-important synagogue. This is rooted in the synagogue's history, architecture, communal value, and religious traditions.

These elements of its significance, however, are at grave risk due to a planning application to construct of 43-story tower at the site of 31 Bury St, just to the synagogue's south.

The proposed tower will cause harm to the synagogue's:

1. Original architectural intent, which is its physical prominence over its setting. This prominence is important architecturally, historically, and religiously.
2. Religiously important sky views.
3. Interior light levels necessary for prayer.
4. The purposeful functioning of the synagogue's architecturally significant windows.
5. The amenity of the communally important courtyard.
6. The meaning of the synagogue's name.
7. The economic viability of the site.

These harms will be explained to in detail in the pages that follow. As Bevis Marks Synagogue is a site of such national and international significance, it is wholly unacceptable to cause this extent of harm to it. It breaches local and national planing policies, and inflicts particular harm to the country's Jewish community who relate to the synagogue much as the Church of England does to St Pauls' Cathedral.

B. The Synagogue's Unparalleled Significance

Bevis Marks Synagogue is the most historically significant synagogue in the United Kingdom. It was the first purpose-built synagogue constructed in England after Jews were readmitted to the country by Oliver Cromwell in 1656. Even until today, it is the only non-Christian house of worship in the City of London, and it existence represents both the City's and the country's history of religious tolerance.

The construction of Bevis Marks Synagogue began in 1699 in the years following the Great Fire of London. It was built in the style of Sir Christopher Wren and blends both Jewish and English architectural motifs. The synagogue was completed in 1701, before St Paul's Cathedral, making it one of the country's most-important houses of worship. It is a Grade-1 Listed building.

Bevis Marks Synagogue is also one of the most important synagogues in the world. Bevis Marks Synagogue is the world's only synagogue to have maintained regular worship dating back to its opening in 1701. Its congregation is comprised of descendants of families who have worship there throughout its centuries of existence. Bevis Marks Synagogue therefore is world Jewry's last remaining unbroken link to the pre-modern era.

This continuity has also allowed the synagogue's congregation to maintain its unique religious heritage and traditions, one of the last vestiges of Spanish & Portuguese Jewry. Furthermore, it's ritual is a blend of ancient Iberian Jewish traditions and English culture, making its intangible heritage of extreme significance to both Judaism and Britain.

C. This Report

A thorough understanding of a heritage-asset's significance is essential for planning authorities to make decisions that might harm said asset. Each heritage site's significance is unique to its particular history, location, function, etc. There are various contributing factors that include heritage, cultural understanding, function, and viability.

This becomes even more crucial when considering potential harm to a listed building, particularly one which is Grade-1 Listed. In such instances substantial harm should be wholly unacceptable, and where less than substantial harm would be caused, it must be outweighed by public benefits of equal significance. These are high bars to overcome.

Of particular concern is 31 Bury St, where a 43-storey tower is proposed. This site sits just twenty-five meters to the synagogue's south. In Historic England's objection letter to this scheme, they consider the harm that would result to the synagogue on account of its: 'intangible associations with its surroundings', 'patterns of use', and 'intentional intervisibility with other historic and natural features'.

This concern has already been confirmed by the City of London's Planning Committee in their decision in 2022 to refuse permission to a scheme on the same site of similar scale. This position is reinforced by the planning inspectors determination to refuse the Tulip proposal (to the synagogue's west) on account of the harm it would cause to the setting of the synagogue.

It is our understanding that Historic England offered to conduct a study in cooperation with the City of London to explore the contributors to the synagogue's significance, but that this offered was not accepted. The following work therefore documents the significant harm that overshadowing from 31 Bury St would cause to the synagogue's significance. This is rooted in an understanding of the unique history, religious meaning, architecture, and use of the site.

This work considers sources that may be unfamiliar to planing officers due to their unfamiliarity with Jewish texts, and records associated with Bevis Marks Synagogue. It is our hope that officers will see this as an opportunity to become better acquainted with wider range of materials than they've previously encountered, and as such will find themselves better acquainted with the significance of Bevis Marks Synagogue, and therefore why infringement to its remaining sky-view is wholly unacceptable in planning terms.

Chapter 2: Important Sources

In order to understand the significance of Bevis Marks Synagogue, it is essential to be familiar with both Jewish religious traditions and sources, as well as the collections of Bevis Marks Synagogue. On account of barriers associated with cultural understanding, language, and accessibility, many of these materials will be largely inaccessible to to those outside of the Jewish community, and indeed outside of the Bevis Marks Synagogue community. The following paragraphs therefore set out a brief introduction to them.

A. Religious Law

The primary text of Jewish law is the Hebrew Bible, though more specifically the Pentateuch (Five Books of Moses). This is often referred to as the Written Law. This distinguished it from what is otherwise called the Oral Law, which are Jewish religious traditions found in later Jewish works, in particular in the massive work called the Talmud (Babylonia, 6th century). The Talmud includes interpretations of the Biblical word, as well as additional rabbinical traditions, that together comprise the form that Judaism takes in its post-Biblical era.

In medieval times, additional Jewish communities took root outside of the Middle East, in particular in Spain and in France. These became known as Sephardi and Ashkenazi, respectively, and while largely the same, each community evolved in somewhat different ways religiously and culturally. For Sephardi Jews, the primary religiously legal work that outlines and directs their traditions is the *Shulhan Arukh* (R Yosef Karo, 16th century).

Beyond these sources, more localised traditions evolved following the Spanish Inquisition, particularly amongst those Sephardi Jews who remained in the West (the Atlantic), and those who settled in the former Ottoman Empire. The Western Sephardi Jews were known for their acculturation and rational Judaism, and those in the east for their religious mysticism.

The Western Sephardi Jews are otherwise known as the Spanish & Portuguese Jews, and are those who re-established London's Jewish community in 1656. They then opened Bevis Marks Synagogue in 1701, England's first purpose-built synagogue since Jews were expelled in 1290 by King Edward I.

B. Communal Records

The community at Bevis Marks Synagogue kept detailed records of their activities. As the only Jewish community, the 'synagogue' oversaw all of the the needs of its community. Their records therefore include minutes from all of this various activities which includes education, health, charity, and worship. These records are housed in the Metropolitan Archives and can be accessed with permission from the Spanish & Portuguese Jewish community.

The archives at large (kept in several other locations) also include historic photographs, prints and paintings, as well as religious objects produced by skilled craftsman, including Huguenot silver and fabric makers, and other archival materials.

Recordings of the synagogue's musical traditions have also been made and are freely available on its website. This is an incredibly important element in the community's intangible heritage, which is preserved and maintained at Bevis Marks Synagogue.

Of course, the most important element of the collection, is Bevis Marks Synagogue itself, which, together with its setting, remains largely as it was when it was opened in 1701.

Taken together, the collection makes up one of the most intact and important community Judaica collections in the world. The collections are vast. Those who study them are always discovering new materials and insights into the history, functioning and nature of this important community.

However, what makes the collection most remarkable is the living nature of it. That is to say, the interplay between the tangible and intangible heritage in a living historic community, that has remained active in its synagogue, in the City of London, for over three centuries. If any one element of this interplay is lost, then the collection in its entirety decreases in its value and significance.

Chapter 3: Brief Introduction to the Bevis Marks Synagogue and Community:

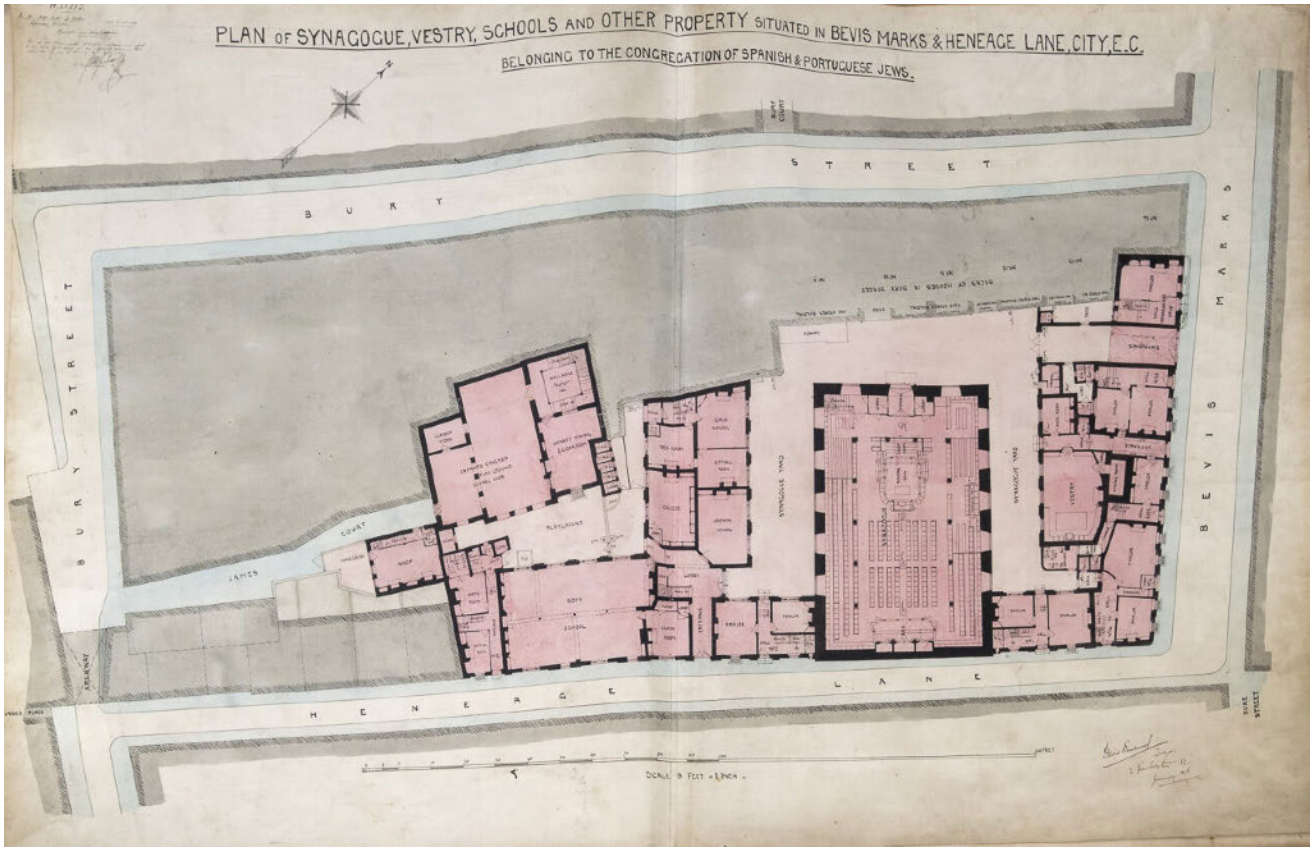
As stated abouve, one of the the most important elements of significance to Bevis Marks Synagogue is the interplay between the historic building, its setting, and the community who has always worshiped there.The setting of the synagogue, its architectural purity, and the ability of its community to continue to use it for worship are therefore key to understanding the synagogue's significance. This sections lays out a brief history of the synagogue itself and its community.

A. The Synagogue Site

Bevis Marks Synagogue was built by Spanish & Portuguese Jews, who first settled in London in the 1650s. The community was fleeing persecution in Spain and Portuguese due to the Inquisitions that had been established there in the preceding centuries. In London they found safety and the freedom to worship openly. They first worshiped in makeshift conditions in a converted synagogue in Creechurch lane, opened in 1657. As the community grew, they sought to construct a purpose-built synagogue on Bevis Marks. To this end they initially leased the land called Plough Yard, and later in the 1700s successfully purchased it outright.

Bevis Marks Synagogue was built from 1699-1701. It is the oldest synagogue in the UK, the only non-Christian house of worship in the City of London, and likely the only synagogue in Europe, or the world, in regular use dating back to its opening in the early eighteenth century. The synagogue was constructed by master builder Joseph Avis, likely according to the design of a Mr. Ransy produced in the years before the synagogue was built.

The synagogue was situated prominently in a courtyard and surrounded by a series of low-rise communal buildings, including schools, housing, offices, ritual baths, and a kosher shop. Through these, the community maintained numerous charitable organisations, including alms houses, medical facilities, and burial facilities on Mile End Road. The community continues to maintain many of these institutions, though their locations have moved across London. Some of the site was redeveloped in the late nineteenth century, though the contours of the site remain largely the same as they were in 1701, with the synagogue dominating its setting.



B. The Community Over Time

Over the centuries many important English Jews have attended Bevis Marks Synagogue, including Prime Minister Benjamin Disraeli, Philanthropist Sir Moses Montefiore, and national boxing champion Daniel Mendoza. Members of the community fought for Britain in the World Wars, including the first Jew to be awarded the Victoria Cross, Frank de Pass. Over sixty members of the community lost their lives fighting for Britain and their names appear on the synagogue's outer wall next to its main doorway. Bevis Marks Synagogue is widely considered the 'Cathedral Synagogue' of British Jewry, akin to St Paul's Cathedral for the Church of England.

The synagogue continues to function as regular place of Jewish worship, in line with its original traditions, and is populated with descendants of those who worshipped there when the synagogue was first opened in 1701. This community is augmented by other Jews living in Central London, City workers, students and visitors to London. The synagogue is also used for weddings, Bar and Bat Mitzvahs, Livery instillation services, national Jewish commemorations, major guest speakers, and other similar events.

Over the past number of years the synagogue has been constructing a new visitor centre with support from the NLHF. Due to this disruption the synagogue has been forced to scale back some of its services that were in place pre-covid. It continues to be open for some weekday services, and for all Sabbaths and Festivals. It is the intent of the community to resume full services with the opening of it centre in May 2025. The visitor centre hopes to welcome over 25k visitors each year, with weekday mornings dedicated to school groups from across the country and local area coming to learn about Judaism.

**Typical Anticipated Week at Bevis Marks Synagogue. Does Not Include Many Additional Festivals.*

*	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
8am	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers
9am	Morning Prayers						Morning Prayers
10am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
11am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
12pm	Visitors	Visitors	Visitors	Visitors	Visitors	Visitors	Morning Prayers
1pm	Visitors/ Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/Prayer	Visitors/ Prayer	Morning Prayers
2pm		Visitors	Visitors	Visitors	Visitors	Visitors	
3pm	Special Events	Visitors	Visitors	Visitors	Visitors	Visitors	
4pm	Special Events	Visitors	Visitors	Visitors	Visitors		
5pm	Special Events						
6pm	Special Events/ Prayer	Lectures/Prayer	Social Event/ Prayer			Sabbath Prayers	Sabbath Afternoon Prayers
7pm	Special Events	Lectures	Social Event			Sabbath Prayers	Sabbath Afternoon Prayers
8pm		Lectures	Social Event			Sabbath Prayers	
9pm			Social Event				

Chapter 4: Massing and Scale: The Synagogue's Setting

It is clear from a variety of sources that Bevis Marks Synagogue was constructed to dominate its setting. For those coming to it, the scale of the synagogue would have dominated amongst its surrounding. The following section sets out an understanding of the synagogue in relation to the area around it, and why further massing, particularly set behind it from the viewpoint of the courtyard entry area, would undermine this historic and religious setting.

This perspective was confirmed by the last planning decision in 2022 that ruled that a tall building at 31 Bury St was inappropriate on account of its overbearing nature on the Bevis Marks Synagogue. This goes beyond the notion of the juxtaposition of new and old, but particularly the experience of Bevis Marks Synagogue as viewed from within the synagogue courtyard.

Indeed, the Tulip inspection confirmed this notion by stating that every additional visible tall building further erodes the historic character of the courtyard setting. This is surely the case, when considering a tall building that would constitute the backdrop to the 1701 synagogue, and as such its massing would cause a grievous harm to the synagogue's protected setting which is necessary for understanding its historic, architectural and religious value. As such it would cause significant harm to its significance.

A. Historic Setting: Secluded Courtyard

Bevis Marks Synagogue is set in a courtyard. According to historians from the past century, this was for the purpose of secluding it from view on account of persistent anti-Jewish sentiment that had remained despite the Jewish community having already been established in the City of London for over four decades. According to some, there may have even been a regulation that required the synagogue be hidden from view off the main street.

More recently, some have suggested that placing the synagogue in a courtyard may have been reflective of the synagogue's prominence, as a way of giving it breathing room and removing it from the clatter and mess of the thoroughfare. Indeed, originally the synagogue courtyard was likely closed off with a solid wooden door, though since the nineteenth century this was been an iron gate permitting glimpses of the synagogue inside.

Whilst public buildings surround the courtyard, they are largely out of view as one enters the courtyard, thus maintaining this historic sense of seclusion. This historic experience can only be maintained by keeping the synagogue's backdrop clear of any overbearing intrusion, a context that would be lost should 31 Bury St be granted approval. There is an important difference between a secluded and an oppressive setting.





B. Religious Intent

According to Jewish religious tradition, a synagogue is meant to be the tallest building in an area. This is codified in Shulhan Arukh chapter 150 (OH). The chapter heading is 'The Building of a Synagogue and that it Should be Tall'. Below you can see the regulations requiring that the synagogue maintains this prominent position, even to the point of restricting heights of buildings constructed afterwards.

150:2 - The synagogue must be built at the height of the city, and it should be raised until it is taller than the usable parts of all other buildings,

150: 3 - If someone built/raised his house higher than the synagogue, some say that we force him to lower it.

The objective of these rulings are to ensure that the synagogue, and what it represents remains prominent amongst those coming to worship. Erosion to this sense of scale, erodes both the religious values that the synagogue's physical prominence represents, and its historic setting.

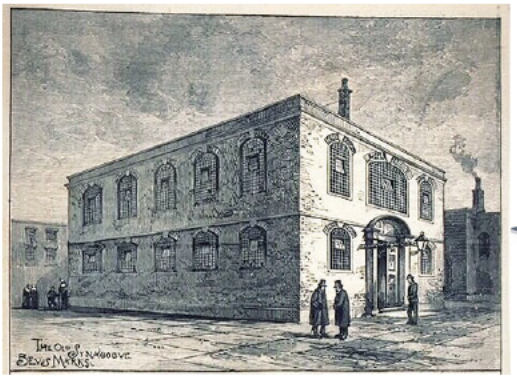
While no renderings have been found of the road Bevis Marks, a drawing from 1890 shows that at least in relation to the buildings next to the synagogue, the synagogue rose in view above them. At the very least, this sense of prominence would have been felt from within the courtyard setting, with no other buildings in view rising around it. It is this sense of scale, that must be preserved to maintain this important religious sense of prominence of Bevis Marks Synagogue mandated by Jewish tradition.

C. Architectural Intent

Beyond this, the synagogue's prominence on the urban landscape, at least from within the courtyard itself, was architecturally part of the original intent of its construction. The plan for Bevis Marks Synagogue was being crafted already in the 1690s. This took place following the Glorious Revolution when William of Orange came to the throne of England in 1688. The led to an increase in migration from the Netherlands and the Sephardi community located there. Amsterdam's Portuguese Jews had themselves completed construction of a new synagogue just a few years before in 1675.

The Amsterdam synagogue largely followed the model constructed by Rabbi Jacob Judah Leon. Leon was more widely known as Templo on account of a plan he drew of Solomon's Temple. It caused a stir and was even exhibited to King Charles II of England.The model placed the ancient Temple in a courtyard surrounded by ancillary buildings, with the Temple sitting prominently in the middle. This model was followed in the Amsterdam synagogue, as the contemporary synagogue in Jewish thought is considered a miniature of of the ancient Temple.

Bevis Marks Synagogue, constructed shortly afterwards, largely followed this paradigm, setting the synagogue in a courtyard, with prominence in relation to the buildings in view all around it. This prominence was not achieved in the manner of church spires, but through the massing of the synagogue itself in contrast to the buildings in view around it. This prominence is only maintained by ensuring its scale continues to dominated its surroundings, by carefully managing visible growth around it.



Bevis Marks Synagogue, 1890



Amsterdam Synagoge



Templo Model With the Temple Situated Atop a Buttressed Temple Mount

Chapter 5: The Sky View in the Synagogue's Setting

The protection of the synagogue's clear sky-view backdrop helps ensure the synagogue retains its historically important prominence as experienced from within the synagogue courtyard. The framing of the synagogue with the sky is what ensures this. However, beyond this, the sky view itself is intrinsic to the understanding of the synagogue and its use.

A. The Synagogue Name

The synagogue is commonly known as Bevis Marks on account of its location on this street. However, the synagogue's actual name is *Sha'ar Hashamayim*. This is Hebrew for 'The Gate of Heaven/Sky'. The origin of this term for a synagogue is in Genesis and the dream of Jacob and the ladder, where he views angels ascending and descending. Upon waking, Jacob exclaimed, 'How awesome is this place! This is none other than the house of God, and this is the gate of heaven' (Gen 28:17). According to Jewish tradition this location was Temple Mount in Jerusalem, hence the connection between House of God and Gate of Heaven.

In Hebrew the word *Shamayim* means both heaven and sky (as in the first verse in Genesis). This is rooted in a religious perspective that relates to heaven as it does to sky, hence the common looking upward to the sky when referring to God or heaven. As such, the sky backdrop is essential to understand the very essence of the synagogue congregation 'The Gate of Heaven/Sky' with its name etched in Hebrew above the synagogue gate and door.

The erosion of this sky view, in such a central location, set immediately behind the synagogue, that would result from 31 Bury St, should therefore be considered a significant harm to the synagogue's significance, and as such should be avoided.



B. *The Synagogue Emblem*

Beginning in the seventeenth century London's Sephardi community annually presented the Lord Mayor with a silver gift. While the exact design of this gift evolved over time, it always included the depiction of a Biblical scene, that of a sentry standing outside the Biblical Tabernacle/Meeting Tent, set in nature. The scene includes clouds and a tree..

The emblem was the official seal of the congregation, and was used on synagogue stamps, and on other communal objects. In these smaller objects the scene was reduced in size, making the original version important for understanding its full meaning.

The Tabernacle traveled with the Israelites as they encamped in the desert for forty years between their exodus from Egypt and eventual arrival in the Holy Land. It continued to serve as the central place of worship until ancient Israel constructed their permeant Temple in Jerusalem. As stated above, the modern-day synagogue is considered a miniature version of these earlier national temples.

That the community chose to illustrate the ancient Tabernacle with a demonstrable sky-setting, and then adopt it as their community's emblem, reinforces the degree to which the sky view is an intrinsic element of the synagogue's significance. Indeed, in the community emblem, the Hebrew name of the congregation 'Gate of Heaven/Sky' is written around it.





C. Religious Worship

The Sky view is also integral to Jewish religious worship. Each month members of the Jewish community go outside during the waxing moon. Upon viewing the moon in the night sky, a prayer is recited (*Kiddush Levana*). It is a prayer for renewal that relates to the moon's renewal during this phase of the moonscape.The prayer is typically said after the evening service, outside of the synagogue, as is both common today and as is depicted in historic drawings of the ritual from the time when the synagogue was constructed.

The synagogue has produced an extensive study of this ritual in the community's history and the negative impact that would be caused by tall buildings to the synagogue's south. These conclusions largely match those of BRE's independent review of GIA's report. However, in brief we will restate several points here.

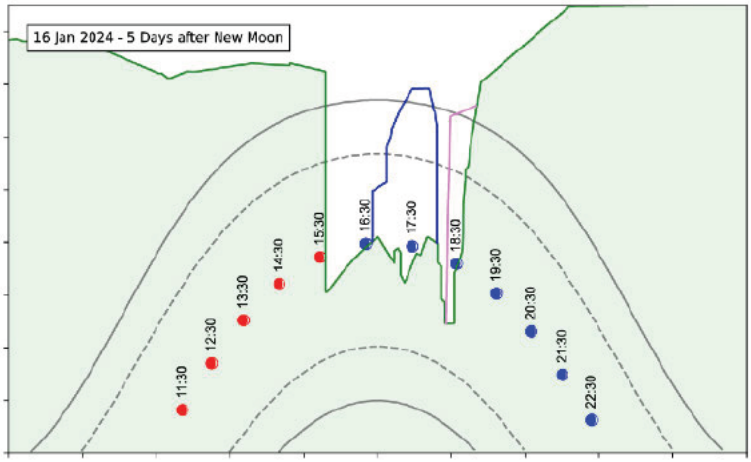
The prayer can only be recited on certain days of the month, and should 31 Bury St be permitted, it would obstruct these views entirely during several months of the year, and significantly reduce them in the remaining months. As such it would cause significant harm to the worship of this ancient Jewish community.

D. Religious Meaning

The use of the synagogue for Jewish worship is intrinsic to its significance. Part of that ritual requires views of the sky, and therefore any obstruction of this view must be considered a significant harm to the synagogue's significance.

Beyond this, views of the sky are important religiously and culturally in Judaism. Traditionally Jews observe the appearance of stars in in the night sky to determine the conclusion of the Sabbath, and the position of the sun in the daytime sky to determine the times for prayer.

Construction of a large tower to the synagogue's south would largely block-out these culturally important views, as the celestial bodies cross the sky along the southern horizon.





1695 Amsterdam Haggadah





Chapter 6: Courtyard Viability: At Risk

The courtyard at Bevis Marks Synagogue plays an important role in both the community's religious and communal activities, and for the synagogue's new heritage centre and cafe. The community at Bevis Marks Synagogue make regular use of the synagogue's courtyard for celebrations and gatherings. Furthermore, the courtyard will function as an important feature on the synagogue's new NLHF supported Heritage Centre, as both a key point for interpretation, and as a setting for its cafe.

The amenity of this space is therefore of utmost importance for the continued vitality and economic viability of this historic community. While it is difficult to quantify amenity, clearly the courtyard is a more enjoyable space with open sky, and without imposing and oppressive buildings overbearing and overshadowing the site. The degradation of the site that would be caused by the proposed tower is therefore both wholly inappropriate, and against planning policy that protects the viability of heritage assets. This negative impact should therefore be avoided.

A. Communal Use and Value

The courtyard at Bevis Marks Synagogue serves several different functions beyond just an access point for the synagogue and as the key location for appreciating the synagogue in its historic settings. The courtyard is also where the community gathers on regular occasion throughout the year.

The courtyard is often used by the worshiping community as a place to hold outdoor receptions following services, whether on a regular Sabbath, or on occasions when the congregation is celebrating a Bar or Bat Mitzvah. The community also utilises the courtyard for the celebration of Succot, Tabernacles, which is celebrated by enjoying food in the outdoor *succah,* hut. Beyond this, the courtyard is also used for Jewish after-work gatherings such as BBQs and other social events.

Additionally, the courtyard is utilised as part of wedding celebrations, which are held regularly at the synagogue throughout the year. In this space people take their first photographs as a married couple, attendees cheer as a couple makes their way out of the synagogue and into the vehicle awaiting them in the courtyard, and some even hold their wedding reception in this space.

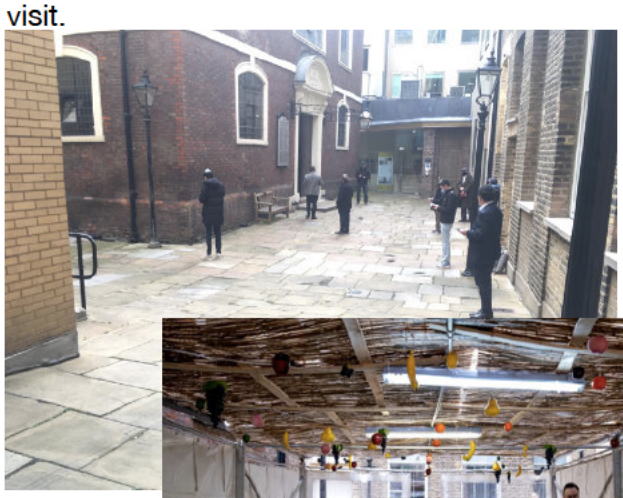
B. Economic Impact

A core element in the synagogue's future viability, is its ability to generate income through weddings rentals, heritage visitors and new cafe. This will allow the community to maintain its Listed Building status, which would be at risk without this additional support.

The importance of the courtyard for weddings has already been explained. Beyond this, the courtyard will serve as an important function in the community's new heritage centre. It is here that visitors will purchase their entry tickets and collect their audio guides. In the courtyard the site's interpretation will begin with an introduction to the synagogue and an explanation of its setting.

Finally, another key component of the heritage centre's success is its new cafe. This will include outdoor seating, which is expected to be an important feature in encouraging visitors to purchase food and drink and to extend their visit.







Chapter 7: Light, Windows, and the Synagogue's Architecture

While the majority of this study has focused on the exterior of the synagogue as it pertains to setting, setting within the framework of Bevis Marks Synagogue also pertains to its interior. This is because the synagogue was constructed with its relationship to its setting as central to a user's experience of the interior.

According to the Talmud, 'A person should pray only in a house with windows' (Berakhot 34b). Rabbi Yosef Karo in his work *Bet Yosef* quotes a number of explanations for this law. They include reasons that relate to the practical use of windows for light, as well as the religious significance of views to the outside during prayer through the windows.

For these reasons, further obstructing the synagogue's windows would cause a practical, architectural and religious harm to the synagogue, that relates to its very significance as a heritage and communal site of the greatest value. Most importantly, further reduction in synagogue's daylighting will render parts of the synagogue largely unusable for worship, the core function of the synagogue.

It is clear from historic drawing and paintings of the synagogue's interior that the synagogue was once bathed in light, as it was intended, both religiously and architecturally. Further reducing this feature should be considered a substantial harm to the synagogue's significance as the section below explains.



Bevis Marks Synagogue, 1890

A. Lighting Levels

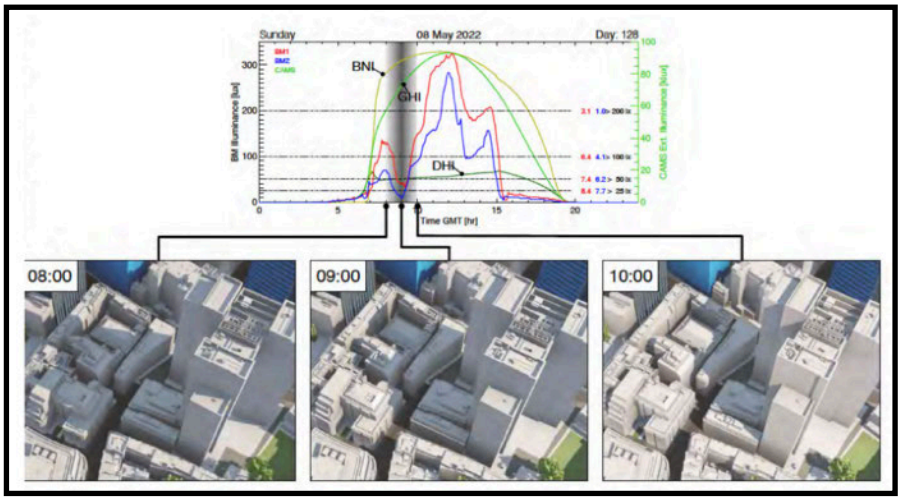
Rabbi Jonah of Gerona (thirteenth-century, Catalonia) explains the reason for requiring windows in a synagogue is that one's (religious and devotional) intention is better when there is light. Indeed, the Shulhan Arukh rules that 'One who builds facing a window of a synagogue, it is not sufficient to leave 4 cubits space, because it (ie. the synagogue) needs a lot of light' (OH 150:4).

Of course, sufficient light is necessary even for the most basic uses of the synagogue, such as the ability to read the prayer book. The synagogue's lighting is reliant on diffused light. Without this, congregants are forced to huddle beneath the limited artificial lighting that was added by the synagogue's columns in the 1920s. This is the case during an after-dark service (aside for special occasions when the synagogue lights its chandeliers, which takes hours to do so, and days to replace). However, during the day, when the congregation's main services are conducted, it is possible to sit anywhere throughout the synagogue and still read the prayers.

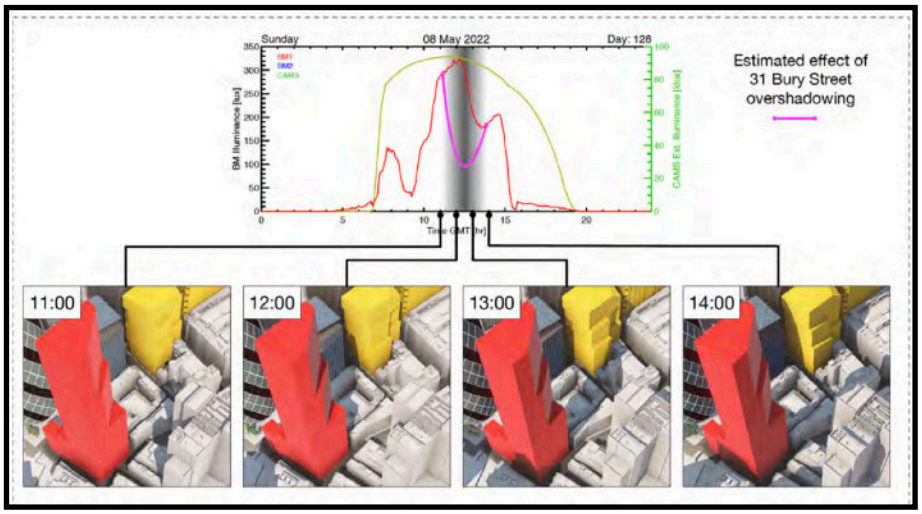
The synagogue has taken interior light-measure readings over the past two years with surprising results. The readers demonstrate that at times interior light levels can reach several hundred lux of light during the morning/midday hours. However, the readers also show a significant drop in light levels in the morning, a phenomenon which is explained by the construction of a tall building (1 Creechurch) twenty-five meters to the synagogue's east less than a decade ago.

It is reasonable to predict a similar impact would be caused by the proposed 31 Bury st as it would be located to the synagogue's south, at a similar distance away, and which will be twice in height as the previously mentioned tower.

Should light levels be further reduced during the daytime, this would render large areas of the synagogue as unusable for worship, the core function of the synagogue. This would constitute a significant harm to the synagogue as it infringes on the synagogue's core significance as a working synagogue, the only one in the world in continual use dating back to 1701.



1 Creechurch Impact



13

31 Bury St Impact

B. Interior Sky Views and their Religious Value

According to the preeminent Talmudic commentary Rashi (Rabbi Shlomo Yitzhaki, France, 11th century) the purpose in requiring a synagogue to have windows is because it exposes the sky, reminding us of our subordination to Heaven. Direct views of the sky still remain from the synagogue gallery. However, these views would be largely lost should permission be granted to 31 Bury St.

Furthermore, the ability to perceive change in the time of day is also important for the language of Jewish prayer. Indeed, as Jews pray three times a day, in morning, afternoon and evening, the language of Jewish prayers reflect these times of day for meaning. These include optimism at new beginnings (morning), endurance (midday), and protection from danger (night).

The ability to perceive the changing times of day is therefore integral to the Jewish tradition and the original construction of the synagogue as its windows on all four sides enabled this. The construction of taller buildings immediately surrounding the synagogue have historically all been capped at their current heights, with sloped roofs, to help preserve these remaining views. If taller buildings are constructed beyond these, these benefits will be lost.

C. Architectural Heritage

The synagogue's windows are an important architectural feature of the building. Its prominent Wren style windows are common amongst important buildings of this era. Their clear-pane glass was considered an innovation, improving upon the wonky glass of medieval times. It is for this reason that earlier churches often had small windows, and employed stained-glass, as the relatively opaque windows of the time were of little other value.

Strikingly, with the innovations of the era, prominent buildings began to feature large clear windows, that both allowed light to enter, and enabled views through them. This had a noticeable impact on the experience of places of worship, changing them from foreboding places with dark interiors, to light-filled spaces.

However, the increase in massing of the synagogue's surrounding area has led to a degradation of the synagogue's interior lighting and views out. Aside for the religious implications of this change, this eroding condition is rendering the synagogue's windows as increasing pointless, undermining their architecture interest and utility. This is a harm to the very fabric of the synagogue, as the lack of use of the windows in their original manner constitutes a harm to the ability to 'read' the space and its architectural intent and significance.



Chapter 8: Conclusion

The above study has demonstrated the wide-ranging harm that the proposed tower at 31 Bury St would cause to the significance of Grade-1 Listed Bevis Marks Synagogue. On account of its massing to the synagogue's south it would undermine the architectural, cultural, and religious integrity of the site and its continued use as a functioning synagogue.

The proposed tower will cause harm to the synagogue's:

1. Original architectural intent, which is its physical prominence over its setting. This prominence is important architecturally, historically, and religiously.
2. Religiously important sky views.
3. Interior light levels necessary for prayer.
4. The purposeful functioning of the synagogue's architecturally significant windows.
5. The amenity of the communally important courtyard.
6. The meaning of the synagogue's name.
7. The economic viability of the site.

The harms are so far reaching, and relate to the core significance of the synagogue in both architectural, historical and communal terms, that it is difficult to classify these harms as anything but substantial.

For these reasons, it should be clear that a tall building on the site of 31 Bury St is completely inappropriate in planning terms and should be refused just as it was two years ago.



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[redacted]

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

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Dear Anna,

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

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

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

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

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

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

All the best,

Alex Ferguson (He/Him)

Development Producer

[redacted]

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

Tel: +44 (0) 207 228 6688
Somerset House, Strand, London, WC2R 1LA
www.fueltheatre.com
(Please note: Fuel operates a hybrid working policy, with staff members working partly from Somerset House, and on remote)

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

Pennycrest Consultancy Ltd
Highgate
N6 5EE

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

11th December 2024
Ref: Bevis Marks

Dear Ms Tastsoglou

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

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

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

To this end I have reviewed the following:-

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

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

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

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

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

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

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

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

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

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

Yours sincerely

[redacted]

Delva Patman FRICS ACIArb
Director

DATE / REF

12/12/2024
SP/17821

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

Dear Ms. Tastsoglou,

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

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

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

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

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

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

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

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

Yours sincerely,
GIA

GIA SURVEYORS LIMITED incorporated and registered in England and Wales with company number 14032506
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Committee	**Date:**
Planning Application Sub-Committee	13 December 2024
Subject: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR 24/00021/FULEIA: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. 24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.	**Public**
Ward: Aldgate	**For Decision**
Registered No: 24/00021/FULEIA and 24/00011/LBC	**Registered on: 11 March 2024**
Conservation Area: Creechurch Conservation Area	**Listed Building: Holland House – grade II***

1. NPPF (12 December 2024)

1.1. The Government has published a new version of the National Planning Policy Framework on 12th December 2024.

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

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

1.4. The new version of the NPPF can be found here: National Planning Policy Framework. This addendum sets out the main changes and updates Agenda items 3 and 4 in relation changes to the wording of the NPPF.

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

1.6. The primary amendments that are most relevant to the determination of these applications are as follows:

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

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

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

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

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

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

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

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

1.9. **Promoting Sustainable Transport**

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

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

1.10. **Making effective use of land**

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

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

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

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

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

1.12. **Other more minor amendments**

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

Chapter or paragraph	**Change**
Paragraph 24	Highlights the importance of effective strategic planning and the duty to cooperate on cross-boundary strategic matters.
Paragraphs 96	Some minor amendments to place additional focus upon the importance of role of health and wellbeing and reducing health inequalities.
Paragraph 100	Additional references to early years and post-16 education in relation to meeting the infrastructure needs of the community
Paragraph 101	Expands the terms for public service infrastructure and places significant weight on the importance of new or upgraded infrastructure.
Paragraph 102	Additional considerations for safety and security in particularly that of children in planning policies and decisions.
Paragraph 125	Makes some minor amendments in relation to the imposition of conditions on upwards residential and commercial extensions
Chapter 12: Achieving well-designed places	Although the title to this section has removed reference to ‘beautiful’ places, reference to this within the text remains.
Paragraph 137	Reference to the National Model Design Code has been refocussed as the primary means for preparation of local design codes.
Paragraph 187	Includes an addition to incorporate biodiversity measures and features

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

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

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

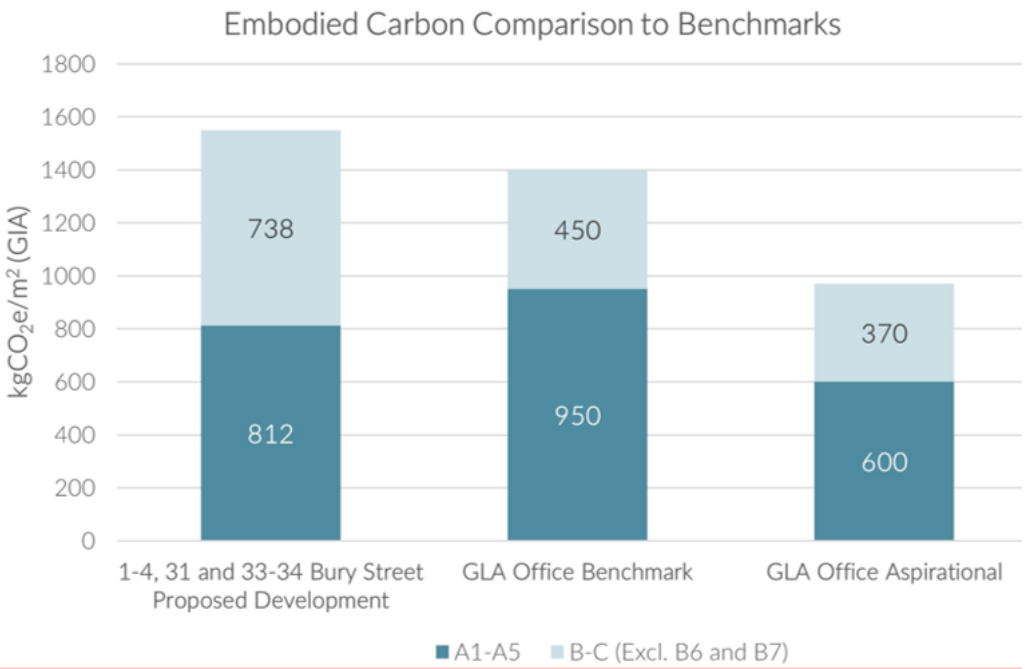
		all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including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

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

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

2. Application cover sheet amendments

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

14. EMBODIED CARBON EMISSIONS	**PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS**  Upfront embodied carbon: 33,517 tonnes CO_2e / 812 $kgCO_2e$ per sqm In use embodied carbon: 30,475 tonnes CO_2e / 738 $kgCO_2e$ per sqm
15. WHOLE LIFE - CYCLE CARBON EMISSIONS	Whole life-cycle carbon emissions: **97,062 tonnes CO_2** Whole life-cycle carbon emissions per square meter: **2,351 tonnes CO_2/sqm**

3. Letters of Representation

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

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

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

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

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

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

4. Sustainability

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

4.2. Page 970 is amened as follows:

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

A1-A5:	812
A-C (excl. B6-B7):	1,529
B6+B7:	822
A-C (incl. B6-B7):	2,351

4.4. Paragraph 1241 to be replaced with:

The proposed whole site development would result in overall whole life-cycle carbon emissions of **97,062,115 kgCO2** being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for **33,941,165 kgCO2** (35% of the building's whole life-cycle carbon), and the embodied carbon emissions for **63,120,950 kgCO2**, (65% of the building's whole life-cycle carbon).

5. Corrections – Main Report

5.1. Please note the further corrections:

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

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

6. Corrections – Addendum 1

6.1. Please note the following corrections:

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

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

Committee:	**Date:**
Planning Applications Sub-Committee	11 February 2025
Subject: XL House, 70 Gracechurch Street, London, EC3V 0HR Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.	**Public**
Ward: Langbourn	**For Decision**
Registered No: 24/00825/FULEIA	**Registered on:** 01 August 2024
Conservation Area: N/A	**Listed Building:** No

Summary

Planning permission is sought for: Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

An Environmental Statement accompanies the scheme.

The scheme would be of high-quality design, delivering best-in-class Grade A office floorspace, meeting one of the primary objectives of the City's Local Plan 2015, emerging City Plan 2040, and London Plan policies, as well as providing new publicly accessible cultural spaces at lower ground and level 32, alongside a new public passageway into Leadenhall Market and extensive public realm improvement works. It results in some loss of retail within a Principal Shopping Centre, but this is considered acceptable when taking into account the nature of the development and the other benefits of the scheme, such as the provision of new active frontages at ground level for retail and cultural uses, a publicly accessible elevated external

terrace, a publicly accessible elevated internal public viewing gallery and new pedestrian routes linking Fenchurch Street to Leadenhall Market.

The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The scheme would deliver over 78,711sq.m of lettable Class E commercial floorspace with associated ancillary space, and would deliver 4.22% of the entire City Plan target of the required commercial space to meet projected economic and employment growth demand. This quantity of floorspace would be a strategic contribution to maintaining the City's position as the world's leading international financial and business centre. The floorspace has been designed to be flexible and adaptable for a range of occupier needs and future demand. This floorspace would help deliver an estimated net increase of 3345 FTE jobs.

The scheme would deliver an increased and significant enhancement of public realm through the opening up of the ground floor, creating a new north-south public route through the site from the corner of Gracechurch Street and Fenchurch Street into Ship Tavern Passage, connecting into Leadenhall Market, and would open to the public 24 hours a day. An area of flexible public realm would be created within the footprint of the development, to the east fronting Lime Street and Fenchurch Street. This space would host a street market during the day and would function as the servicing bay after hours.

The scheme would provide a new retail/food and beverage unit at ground floor fronting both Gracechurch Street and the new public passage, which would drive footfall and spend, as well as significantly animating the ground plane. This would transform the site into a key gateway into Leadenhall Market and the Cluster from the south, significantly improving the arrival experience. Furthermore, the scheme provides a varied range of retail/event/cultural spaces at ground floor and lower ground mezzanine, including a retail pop up area within the new permeable accessible space on the southwest of the development.

The scheme would provide an elevated public space at Level 32, totalling around 1,251sq.m of floorspace consisting of an internal area of 851sqm with a 400sqm external terrace. The public viewing gallery would offer views across London to the north, south and west. The space would be managed by the Applicant and would be made available for the benefit of City workers, residents and visitors.

1,106 long term bicycle spaces would be provided at basement levels 1 and 2 with associated shower and locker facilities. 65 short stay spaces would further be provided; 19 of these spaces would be located at ground level within the new public realm area in the east area of the development, and an additional 46 spaces would be provided within the cycle store at Basement Level B1 for visitors of the development. Servicing to the site would take place between the hours of 22:00 to 06:00 at ground level within the new dual-use public realm open space to the south-

east corner of the site, where consolidation of a minimum of 50% would equal a total maximum of 48 delivery and servicing trips per day. One accessible car parking space would also be located in this area. Significant improvements to Fenchurch Street. Gracechurch Street, Lime Street and Ship Tavern Passage through a S278 agreement weigh in favour of the scheme and would help link to the wider transformational public realm improvements.

The scheme would be acceptable in environmental terms. The daylight, sunlight, wind microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight or sunlight to nearby dwellings or religious buildings to unacceptable levels such that it would warrant a refusal of permission.

The building would be designed to high sustainability standards, propose an increase in local greening and ecological value, energy efficient, targeting BREEAM 'Excellent' and adopting Circular Economy Principles by retaining 60% of the existing structure and integrated urban greening.

The proposals would bring a quiet architectural charisma to the western edge of the Cluster, being a sensitive and sustainable exemplar of tower design. It would optimise the use of land, delivering strategic uplift in high quality office space, and publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, DM10.3, DM10.4, DM10.8, emerging City Plan 2040 policies S8, DE1, DE2, DE3, DE4, London Plan D3, D4, D5 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

The proposal would deliver a tall building on a suitable site in the Eastern Cluster/emerging City Cluster in accordance with Local Plan Policy CS14 and CS7, emerging City Plan 2040 Policies S12 and S21, London Plan Policy D9.

The proposal would not harm and would preserve all relevant pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13, emerging City Plan 2040 Policy S13 and London Plan Policy HC2, HC3 andHC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. In

consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace). Following rigorous assessment, it is concluded that the proposal would preserve the Outstanding Universal Value and significance, authenticity and integrity of the Tower of London World Heritage Site, according with the aforementioned policies and associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

The proposal would preserve the settings and significance of all designated heritage assets assessed, in accordance with Local Plan policies CS12, DM12.1, emerging City Plan policies S13 and HE1 and London Plan policy HC1, and would, subject to conditions, preserve archaeology in accordance with DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

A consultation response to the proposals have been received from Historic England, providing advice but not formally objecting, stating harm could be found to the significance arising as result of the impact on views from within the Inner Ward because of the increase in the amount of modern development visible. Further concerns relate to: The impact of the proposals when viewed upstream at Waterloo Bridge and the effect of daylighting of Leadenhall Market and any loss of light as a result of this scheme could harm the special interest of the listed building. Historic England have however stated that the current design of the tall building is calmer than the previous consent, helping to reduce its visual impact in some views. A consultation response has also been received from the Surveyor to the Fabric of St Paul's Cathedral, seeking assurances that the proposed development would not be visible in views from the Processional Route (Fleet Street), which the scheme would not be, in addition, the Surveyor to the Fabric highlighted the potential impact of the proposed tall building and the expansion of the cluster as a whole, officers have considered this aspect of the scheme in detail and consider that the proposals would not harm St Paul's Cathedral or any protected views.

Objections have been received from nearby residents of 2-4 Bulls Head Passage and Jamaica Buildings, which relate to: loss of daylight and sunlight to these residential properties, Leadenhall Market and the Leadenhall Market Conservation Area, noise and dust from construction, the need to strip back and rebuild the existing site, new access pedestrian routes into Leadenhall Market and lack of engagement and consultation of the previously consented scheme. Officers have considered these objections and clear reasoning had been provided in this report as to how the proposals would address these objections, including any requisite mitigation which would be secured by conditions and in the Section 106 Agreement.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the

proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through CIL (of approximately £3,908,100.00 million) for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

Taking all material matters into consideration, Officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan and other material considerations which weigh against the grant of planning permission.

In this case, the proposals are considered to comply with the majority of development policies in particular those which encourage office development in the City the heritage, design, tall buildings and public realm policies, but not complaint with the retail policies as outlined above and in the ensuing report. It is the view of officers that, as a matter of planning judgement, that as, in particular, the proposals make would make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, tall buildings and public realm policies, they accord with the development plan when considered as a whole.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

Paragraph 135 of the NPPF sets out that planning decisions should add to the quality of the area, follow best practice architecture and urban design, be sympathetic to local character, establish a strong sense of place, optimise the potential of the site and create places which are safe, inclusive and accessible. The proposals comply with this objective of the NPPF.

As set out in paragraph 212 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). Officers have concluded that the proposed development would not harm any designated heritage assets.

Taking all material matters into consideration, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

Recommendation

(1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:

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

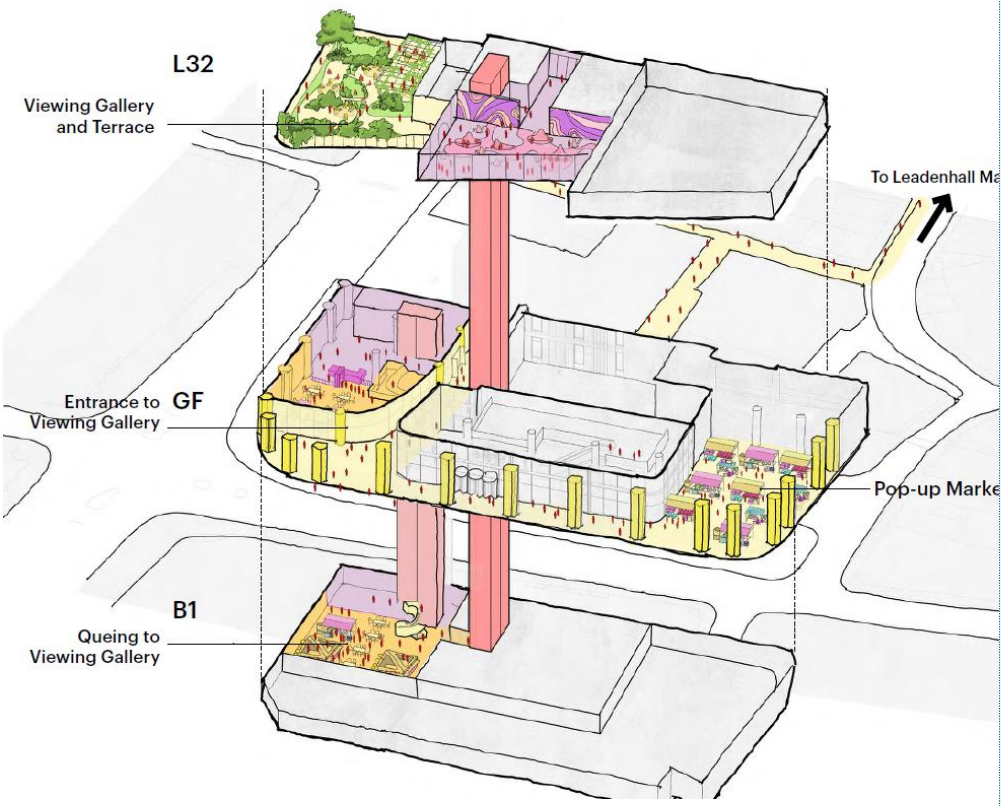
(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed; and

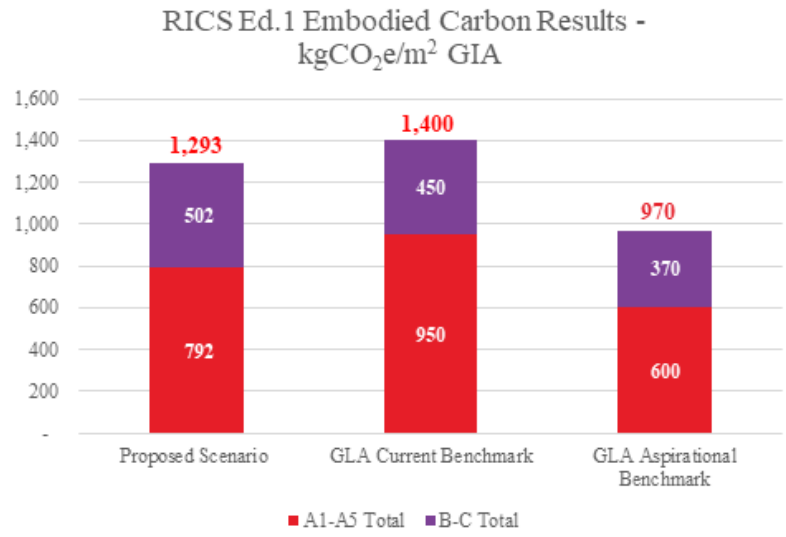
(3) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

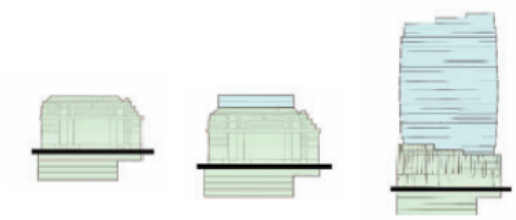
APPLICATION COVER SHEET

70 GRACECHURCH STREET (24/00825/FULEIA)

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	58.25m AOD (41.05 m above ground level building height) Ground plus 7 storey building, four basement levels		149.67m AOD (132.470 m above ground level building height) Ground plus 32 storey building	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED GIA (WITH PLANT APPORTIONED)	
	Office (Class E(g))	20,314	Office (Class E(g))	78,711 sqm
	Retail/Food and Beverage (Class E(a)-(b))	7,757	Retail/Food and Beverage (Class E(a)-(b))	195sqm
	Cultural space/Public Viewing Gallery (Sui Generis)	0	Culture/Public Viewing Gallery (Sui Generis)	1,273sqm
	TOTAL	28,071 sqm	TOTAL	80,179sqm
			TOTAL UPLIFT:	+ 52,108 sqm
3. OFFICE PROVISION IN THE CAZ	78,711 sqm GIA			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	Approximately 1,340 FTE		3,194 FTE	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0 1 blue badge space
	Cycle long stay	0	Cycle long stay	1,106
	Cycle short stay	0	Cycle short stay	65
	Lockers	0	Lockers	739
	Showers	0	Showers	56

	Changing facilities	0	Changing facilities	2
6. HIGHWAY LOSS / GAIN	Stopping up within City of London: 17.30sqm. Area gained within City of London: 20.81sqm. Net highway gained for City of London: 1.68sqm Area gained for Transport for London: 1.68sqm			
7. PUBLIC REALM	Proposed 910.34sqm of on site public realm area, including new through-site link and market area			
8. PUBLIC VIEWING GALLERY/CULTURAL SPACES	  Basement 1 Kitchen / Roastery Immersive Gallery Community Room Ground Floor Social Cafe' / Bar Artisanal Alcove Pop-Up Space Level 32 Terrace Servery Exhibition Corner Wellness Activities		
9. STREET TREES	EXISTING		PROPOSED	
	0		0	
	EXISTING		PROPOSED	

10. SERVICING VEHICLE TRIPS	113 daily (17 in peak hour)	48 daily (7 in peak hour)
11. SERVICING HOURS	22:00 – 06:00	
12. RETAINED FABRIC	60% of the existing superstructure and substructure (by mass)	
13. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 13% GLA policy target: 35%	
14. OPERATIONAL CARBON EMISSIONS	93,857 tonnes CO2 over 60 years 1,171 kg CO2 per square meter over 60 years (includes life-cycle modules B6+B7)	
15. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS (RICS V1)	
	 Embodied carbon comparison to GLA benchmarks (kg CO2e/m2) Upfront embodied carbon: 63,522 tonnes CO_2 / 792 kg CO_2 per square meter Embodied carbon: 103,705 tonnes CO_2 / 1,293 kg CO_2 per square meter	

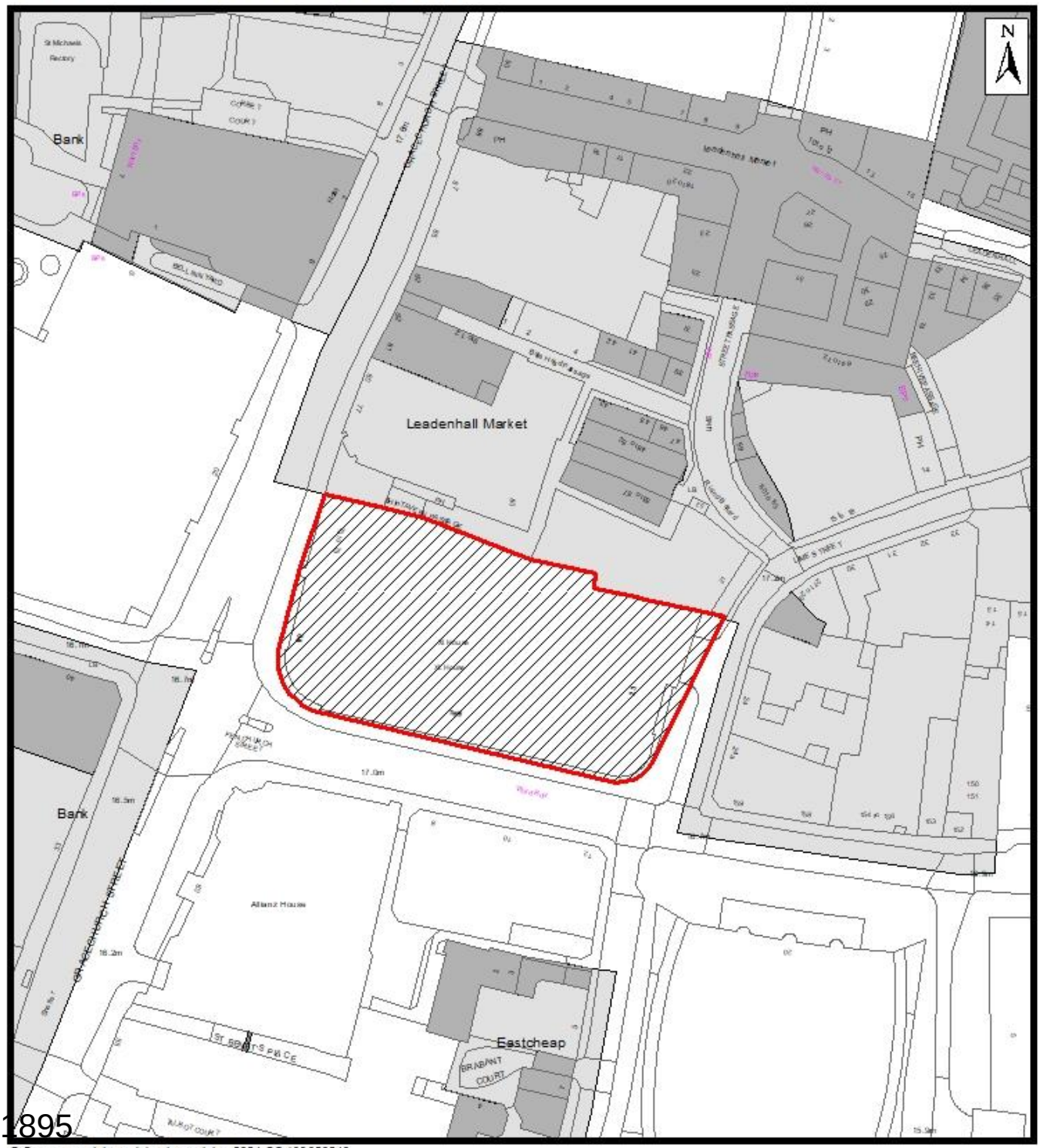
16. WHOLE LIFE - CYCLE CARBON EMISSIONS	Total embodied and operational carbon: 197,562 tonnes CO2 Embodied and operational carbon per square meter: 2,464 kg CO2 per square meter
17. WHOLE LIFE-CYCLE CARBON OPTIONS	

Option Reference	Option 1	Option 2	Option 3
	Retrofit	**Retrofit plus 2 additional storeys**	**Retrofit/partial demolition plus additional tower structure**
	Existing building to be retrofitted to modern day standards without any structural strengthening work, alongside change of use from department store to office. Public route through ground floor not provided.	Existing building to be retrofitted to modern day standards with a 2-storey extension and minor strengthening works, alongside change of use from department store to office. Total of 10 storeys.	Retention of as much of the existing building with a 25-storey extension and major strengthening works. Total of 33 storeys. Public route through ground floor provided.
Project reference period	60	60	60
Gross Internal area (GIA) m²	28,056	31,676	77,633
Net Internal area (NIA) m²	11,481	14,419	50,643
Change in NIA (compared to existing) m²	0	2,938	39,162
Substructure % retained by mass	100%	100%	55%
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	95%	40%
Total WLCA (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *Module B7 is not considered*	**936**	**993**	**1,406**
Upfront Embodied Carbon (A1-A5) excl. sequestration ($kgCO_2e/m^2$ GIA)	357	411	821
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7($kgCO_2e/m^2$ GIA)	450	450	450
Estimated Whole Building Operational Carbon for building life time (B6) ($kgCO_2e/m^2$ GIA)	129	129	129
Total WLCA (incl. B6 and pre-demolition) (tCO_2e) *Module B7 is not considered*	**26,256**	**31,452**	**109,186**
Total existing building demolition (tCO_2e)	0	98	469
Upfront Embodied carbon (A1-A5) (tCO_2e)	10,005	13,006	63,751
In-use embodied carbon (B-C) (tCO_2e)	12,626	14,255	34,935
Operational Carbon for building life time (B6) (tCO_2e)	3,625	4,093	10,031

18. TARGET BREEAM RATING	Score of office use: 87% Good | Very Good | **Excellent** | Outstanding Policy target: Excellent
19. URBAN GREENING FACTOR	0.33

20. AIR QUALITY	Air Quality Neutral

Site Location Plan



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Image 1: View of existing building looking east at the junction of Gracechurch Street, Lombard Street and Fenchurch Street



Image 2: View of existing building, looking east from Fenchurch Street



View 3: View of existing building, looking west from Fenchurch Street



Image 4: View of existing building at Ship Taverns Passage

Main Report

Introduction

Environmental Statement

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

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

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

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

4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any

other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

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

7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in December 2024. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information. The additional information builds upon the assessments presented in the August 2024 Environmental Statement, to assess the changes to the cumulative assessment only, alongside some minor design changes and their impact on Townscape and Heritage as originally presented in Volume 2 of the ES. All elements of the August 2024 ES not covered in the ES Addendum are considered to remain valid. Any new likely significant effects are assessed and discussed in the relevant sections of this report.

8. The effect interactions of each of the likely significant effects has been considered in the assessment. Mitigation and monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

Site and surroundings

9. The site occupies the corner plot between Fenchurch Street to the south and Gracechurch Street to the West. It is bounded by Ship Tavern Passage to the North and Lime Street to the east.

10. The existing building, completed in 2001, is 8 storeys high with four basement levels and comprises a gross internal area of 28,071 sq.m. The Commercial, Business and Service (Use Class E) building includes retail use from lower ground to first floors and office use above. The existing building encompasses the majority of the Site with the remaining area comprising public highway and permissive path. Party walls lie to the north of the Site, at the Swan Tavern Public House and 21 Lime Street.

11. The site is immediately abutted to the north and east by the Leadenhall Market Conservation Area. Land to the east side of Lime Street is in the Leadenhall Market Conservation Area and land to the west side of Philpot Lane lies within in the Eastcheap Conservation Area.

12. The site is located in a prominent location on the western edge of the City Cluster. There are a number of nearby tall buildings benefitting from planning permission, the most prominent being the 74 storey 1 Undershaft. Other nearby consented schemes include 60 Gracechurch Street (36 storeys), 50 Fenchurch Street (36 storeys), 85 Gracechurch Street (32 storeys), 100 Leadenhall (57 storeys) and 55 Bishopsgate (63 storeys).

13. Residential properties at 4 Bulls Head Passage lie to the north and at 14 Lime Street to the north east of the site.

14. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the highway authority.

15. There are a number of listed buildings within the immediate vicinity of the site. These include:

- Leadenhall Market (Grade II*)
- 81-82 Gracechurch Street (Grade II)
- The Ship Tavern, 27 Lime Street (Grade II)
- 39-40 Lombard Street (Grade II)
- 38 Lombard Street (Grade II)
- 7-9 Gracechurch Street (Grade II)
- Custom House (Grade I)
- Billingsgate Market (Grade II)
- Adelaide House (Grade II)
- Cannon Street Station Towers (Grade II)

16. Other listed buildings in close proximity include:

- The Tower of London (World Heritage Site, Scheduled Monument and listed buildings),
- Tower Bridge (Grade I),
- The Monument (Scheduled Monument and Grade I),
- Lloyd's Building (Grade I), 24-28 Lombard Street (Grade II),
- 60 Lombard Street (Grade II),
- St Edmund's Church (Grade I),
- 27-28 Clement's Lane (Grade II) and St Clement's Church (Grade I) all in the Bank Conservation Area;
- 37-39 Lime Street (Grade II) in the Leadenhall Market Conservation Area and 2-3 (Grade II) & 7-8 (Grade II*) Philpot Lane and 4 Brabant Court (Grade II) in the Eastcheap Conservation Area.

Planning History

17. The existing building, XL House, was granted planning permission on 21 October 1998.

18. The most recent planning permission was granted on 29 September 2021, under planning permission reference 20/00816/FULEIA for:

    "Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 *upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works."*

19. Since the 2021 permission there have been no new relevant applications, though temporary art installations have been permitted in relation to the Sculpture in the City programme.

20. The 2021 permission would expire in 2026 and has not been implemented.

Proposals

21. Planning permission is sought for:

22. Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

23. The scheme would provide 80,179 sq.m GIA floorspace comprising:

    - 78,711 sq.m of office floorspace;
    - 195 sq.m of flexible retail; and
    - 1,273 sq.m of public access space including cultural use

24. The maximum height of the proposed development would be 149.67m AOD. The proposed development includes a base podium building and tower split into three vertical forms. The base would be stepped in height, the eastern part would be ground plus five storeys, stepping up to eight storeys on the corner of Gracechurch and Fenchurch Streets. The podium would be solid form,

expressed in masonry with curved facades and punctuated with glazing topped with terraces and planting. The base includes a new public route through connecting the corner of Gracechurch Street and Fenchurch Street to Ship Tavern Passage. The tower that sits above the podium presents itself as three massing volumes which step upwards from west to east at the crown. The western massing reaches a height of 144.61m AOD, the central massing reaches a height of 147.48m AOD and the eastern massing reaches a height of 149.64m AOD. The vertical components of the massing at the edges would be tapered with the widest points being located in the middle of the tower volume, before tapering back inwards to appear more slender. The upper three floors of each massing volume would be angled more sharply inwards than the floors below to articulate the crown of the building.

25. The scheme provides a significant increase in office floorspace and a reduction in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses and access to a cultural use, with flexible Grade A office floorspace above.

26. The main office entrance would be from Fenchurch Street, with access to the culture and retail spaces being provided on Gracechurch Street. The southeast corner of the proposed building would be open-sided, providing a large area of outdoor publicly accessible space in daytime hours, with the area in use as a servicing area after hours. This enables pop-up retail uses in this area, fronting Lime Street and providing further activation of this space. The vehicle lifts proposed in the consented scheme are no longer proposed, and servicing would take place at ground floor level.

27. Access to the public viewing gallery at level 32 would be provided from lower ground floor level, with dedicated lifts and supported by a security check area. Access to the lower ground area would be provided by the dedicated lifts and a staircase to a ground level entry lobby, with entrances placed on Gracechurch Street and the new passageway. The viewing gallery is located to offer views across London to the north, south and west. The public viewing gallery would be managed by the applicant and made available to City workers, residents and visitors. It would feature 709sqm of internal space with seating and a small bar/café. This space would be programmable for events which would be ancillary use to the public viewing gallery. There would also be an external terrace of 445sqm with a pergola and a café/bar space, alongside extensive landscaping and seating.

28. When exiting the lifts from the public viewing gallery you would exit via Ship Tavern Passage. The north to south passageway would connect to the network of passageways providing access to Leadenhall Market.

29. The scheme would provide a retail space at ground floor, accessed from entrances on Gracechurch Street and the new public passageway.

30. The proposed scheme would incorporate intensive and extensive urban greening, including large, planted terraces at podium and roof levels, and planters at ground level along the Gracechurch Street elevation.
31. Tenant terraces are proposed at levels 5-7 (podium level) and levels 28 to 31 at the rooftop on two of the three tower roofs. The space would be landscaped and be demised to the office occupiers as amenity space. The space would offer amenity to users, supporting healthy, varied and engaging workplaces. The perimeter of the terrace would have 1.7m high upstand balustrades and landscaped areas.

32. Off street servicing would take place from an open area of dual-use public realm accessed via Lime Street. When not in use as the servicing area, this space would publicly accessible and would be host to an outdoor street market.

33. The development would have three basement levels, with the existing basement reused as far as possible – the existing basement level would be demolished and rebuilt to give a higher plant floor to the level below. The proposed basement level 1 would accommodate part of the publicly accessible cultural use, as well as end-of-trip cycle facilities, including cycle parking. Basement level 2 would accommodate further cycle parking and plant, with basement level 3 exclusively used for plant. The existing basement level 4 would be partially infilled.

Consultations

Statement of Community Involvement

34. The applicants have submitted a Statement of Community Involvement prepared by London Communications Agency, dated July 2024, outlining their engagement with stakeholders, including four public exhibition events held between 23 April 2024 and 27 June 2024.

35. The applicant's consultation period was split in two, with phase 1 (April and May 2024) collecting feedback on the early proposals, and phase 2 (June and July 2024) seeking feedback on more detailed design proposals.

36. Engagement activities included:

    - A consultation website was launched in April 2024 with comprehensive information on the proposals and a comment section to collect feedback. The website was viewed by 2,947 people 3,409 times over both phases of engagement.

- A two-page A5 flyer with information on the consultation events was sent to 2,046 residents and businesses in an area surrounding the site that was agreed with officers. Flyers were sent for both phases of engagement.

- 15 key political and community stakeholders were invited to public exhibitions via letter to discuss the proposals and to share information on the consultation programme. These included the Chairman of Planning and Transportation, ward members for both Langbourn and Bridge, as well as St Edmund the King, St Clements Eastcheap, St Margaret Pattens and St Peter-upon-Cornhill churches.

- Alongside the exhibitions, two meetings were arranged with key stakeholders, including the Chairman of Planning & Transportation, the Planning and Development Director and EC BID.

- An advert was placed in the City Matters publication and a social media campaign was run ahead of the exhibitions which reached 418,778 people. An email inbox and freephone line were set up for the consultation period, with 6 emails received.

- The first phase 1 public exhibition was held in Leadenhall Market EC3V 1LT between the hours of 11am to 2pm on 23 April, and in total 17 people attended. The second phase 1 exhibition took place in the Vestry at St Edmund the King church, 60 Lombard Street, London, EC3V 9EA between the hours of 4pm to 7pm on 25 April. Twelve attendees were reported. In total, 10 people completed the phase 1 consultation survey, either digitally or in written form.

- Both phase 2 exhibitions were held in the foyer of 70 Gracechurch Street, between the hours of 4pm to 7pm on the 25 and 27 June 2024. The first exhibition reported 13 attendees, and the second reported 6. In total, 4 people completed the phase 2 consultation survey, either digitally or in written form.

Statutory Consultation

37. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon twice under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Consultation – August 2024

38. Nearby residential occupiers were notified directly of the application by letter on 09 September 2024.

39. The application was advertised in the press on 10 September 2024.

40. Site notices advertising the planning application were posted in 13 locations around the site on 03 September 2024.

41. At the time of publication of this report, two objection letters have been received. A summary of the representations received, and the consultation responses is set out in the table below.

42. All representations made in relation to the application are available in the public case file and have been read in full and considered in making this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.

Consultation Responses	
Health and Safety Executive	No comments.
Historic England	"The current proposal would broadly conform to the same design parameters as the recently consented scheme on this site. We previously raised concerns about the proposed tall building's harmful impacts on the significance of London's historic environment, including to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS), St Paul's Cathedral and Leadenhall Market. These impacts remain similar in the new application proposals. We recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views. <u>Impact of the proposals</u> The current proposals are broadly similar to the recently consented scheme at this site (20/00816/FULEIA). Various aspects of the design have been revisited, including the partial retention of the existing building on the site. The scale and massing remain similar, as do the harmful impacts on the settings of the heritage assets, which we note here: a) Tower of London World Heritage Site We previously found that the proposed development would cause some harm to the Tower of London because of the increase of modern development appearing in keys views from the Inner Ward and these impacts remain broadly the same. Though the harm would be modest, it would contribute to the erosion of attributes of its OUV, and consequently the integrity of the WHS.

	b) St Paul's Cathedral A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right. St. Paul's is the Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development in the City Cluster should be of an appropriate height and of high architectural design quality. The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an 'outlier' further to the right. The visual tension created by the cluster in this view of St Paul's Cathedral and on the wider character of the City is likely to increase as the mass of the cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral. c) Leadenhall Market The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as the loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability. We recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and improved public realm in general. We acknowledge that better accessibility to the adjacent grade II* listed Leadenhall Market also has the potential to improve its setting. <u>Historic England's position</u> We reiterate the concerns that we have previously raised about similar development proposals on this site, and the expansion of the Cluster in general, given the harm it

	would cause to heritage assets of the highest possible designations. The status of the Tower of London as a World Heritage Site means that preserving that part of its significance, from which it derives its attributes of OUV, as well as its integrity and authenticity, must be given the greatest possible weight as required by the NPPF. The City's adopted policies alongside those of the London Plan provide for a robust protection of the City's historic environment and its skyline, including the Tower and Cathedral. UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative impact of tall building development within the Tower of London's setting. We acknowledge that the consented scheme is now a material consideration and recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views, which we welcome. Nevertheless, the harm we have identified will need to be taken into account. **Officer response:** This is addressed in the Design and Heritage sections of this report.
GLAAS, Historic England Archaeology	Conditions and informatives are recommended.
Environment Agency	No comments.
Natural England	No objection.
Transport for London, Spatial Planning	Thank you for consulting TfL. In regard to the above application, TfL have the following comments: Gracechurch Street (A1213) forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN. <u>Trip Generation</u> The applicant has provided trip rates for lunchtime peak periods between 1pm-2pm – this is supported. The applicant has also clarified that the sites selected within the TRICS database are based on relevant existing office developments within the City of London.

	Pedestrian Comfort Levels (PCL) As requested in TfL's pre-application comments, the applicant has provided further assessment of PCLs, with most expected PCL results a minimum of B+. Further assessment of PCLs should be provided prior to determination. The applicant has assessed only one arm of the junction (see TA Figure 5.3). A PCL assessment is needed for all four arms of the junction, such as Lombard St with Gracechurch St and Fenchurch St. It is welcomed that for the assessed junction arm of Gracechurch St and Fenchurch St, the applicant has proposed mitigation for the worst-case scenario score of C+. The applicant should also provide a PCL assessment of the pit lane and the footway gantry temporary arrangements proposed for construction. This could be secured by pre-commencement condition. The applicant has confirmed that 10% of the pedestrian trips would be diverted on to the new pedestrian route - This is accepted by TfL. Highway Improvements The new pedestrian link proposed to join Leadenhall Market via Ships Tavern Passage to Fenchurch Street and A10 Gracechurch Street must be publicly accessible 24 hours a day and 7 days a week and secured by Section 106 (S106). For the viewing gallery, access is proposed via Gracechurch Street. TfL has requested and recommended access from Ships Tavern Passage instead of the A10. This comment is reiterated from pre-application discussions and should be addressed. TfL introduced a Traffic Order on the A10 Gracechurch Street corridor in January 2022 which became permanent in July 2023. The order restricts through traffic on parts of the corridor from 7am and 7pm, Monday to Friday. Along with temporary improvements to the corridor implemented as part of the COVID-19 pandemic Streetspace for London programme, this project has improved conditions for pedestrians, cyclists and bus passengers. In line with Healthy Streets and the Mayor's Vision Zero target to eliminate all deaths and serious injuries from London's transport system by 2041, a contribution is sought towards TfL's permanent works along the A10 corridor, which will both complete and enhance the recent improvements already delivered.

	Data collected during the experimental phase of TfL's A10 improvements showed that it resulted in faster bus journey times and safer cycle journeys. Through traffic, including taxis, is now restricted on parts of the corridor between 7am and 7pm, Monday to Friday. Wider footways were created at points along the route, and further long-term safety and public realm improvements are now being planned for future delivery by TfL, in partnership with the City Corporation as the highway authority for adjoining roads. Based on a net uplift in floorspace proposed in this application that we estimate to be 52,108 sq m GIA, a £800,900 s106 contribution to the TfL A10 corridor improvement scheme is sought, index linked to the BCIS General Building Cost Index, not the Retail Price Index. The payment of £800,900 to TfL will be required prior to commencement, or alternatively the completion of a s278 Agreement with TfL for certain works prior to commencement would be acceptable instead. This can be reflected in the s106 and s278 agreements. In the event a s278 Agreement for the s278 works has been entered into prior to commencement, the applicant must complete the s278 works prior to occupation. The TfL highway improvements requested should include but not be limited to: - safety improvements to junctions in the vicinity of the Site; - measures in the vicinity of the Site to improve safety and security at night and reduce fear of crime; - pedestrian corridor improvements in the vicinity of the Site; and - any other strategic highway mitigation works reasonably necessary to the make the development acceptable The s278 Works defined should include but not be limited to: - pit lane on A10 Bishopsgate to support construction of the development (subject to agreement of this requested contribution or alternative equivalent s278 works through further discussion and negotiation with TfL) - footway improvements to North East corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction

	- potential signal retiming at same junction - supporting highway modelling if necessary - Road Safety Audits (RSAs) - following TfL Streetscape Guidance with approval from TfL - ensuring sufficient space along the A10 for Bus operations and for Cyclists to pass Buses and other traffic safely on the near side both northwards and southwards - co-ordination with 60 Gracechurch Street development's highway works - improving the crossings and footways that connect to the North West corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction To ensure the development complies with London Plan policies T1 (Strategic approach to transport); T2 (Healthy Streets); T4 (Assessing and mitigating transport impacts), T5 (Cycling), D8 (Public realm) and D9 (Tall buildings) <u>Access</u> The applicant has conducted a Road Safety Audit (RSA) on the vehicle access from Lime Street; as this impacts local authority highway it is for the City Corporation to consider. The applicant should confirm if the RSA followed TfL RSA procedure SQA-0170. Pedestrian access is proposed to be from Ship Tavern Passage to the north and Fenchurch Street/Gracechurch Street to the south. Further work is required including relocation of the proposed entrance to the viewing platform from A10 Gracechurch Street to Ship's Tavern Passage. <u>Car parking</u> TfL welcomes that the proposal would be car free, with 1 blue badge parking space in line with London Plan Policy T6. The bay should be marked as a disabled persons parking bay in line with Policy T6. A pre-booking system should be in place to ensure the space is effectively managed. The electric vehicle charging point (EVCP) for this space is welcomed. <u>Cycle parking</u> Access: Cycle parking is proposed to be accessed on the eastern side of the site via Lime Street to access the stairs, or the open space to the south-east of the site for access to the lift. Long stay will be located at basement levels 1 and 2

	with associated end of trip facilities, and short stay will be located within the site boundary and at basement level B1. The applicant should clarify signage and management measures proposed for short stay cycles left overnight, as these may conflict with the delivery and servicing vehicles. TfL has previously requested the size of the cycle lifts and stairwell gradient to ensure compliance with London Cycle Design Standards (LCDS). This should be provided urgently. Quantum: The proposed development would provide 1,106 long-stay cycle parking spaces and 65 short-stay spaces in line with London Plan Policy T5. The applicant has clarified that 5% of long stay cycle parking spaces are capable of accommodating larger/adapted cycles, and 11% of short-stay spaces are adaptive as per TfL's requests. 3 cargo bike spaces would be provided at grade by the pop-up market and in public space to the south-east of the site. 10 public cycle spaces will be re-provided on Lime Street on City Corporation highway, which is also welcomed. Design: The applicant has provided further information on the design of the cycle parking spaces - the proposed mix of two tier, Sheffield stands and adaptive spaces is in line with guidance in the London Cycling Design Standards. The applicant should clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided. <u>Cycle hire</u> £100,000 only is now requested to part-fund a new docking station in Rood Street. £100,000 previously also requested should be allocated instead to the A10 corridor improvement project mentioned elsewhere. The TA has set out that a financial contribution to a new Santander cycle hire docking station is acceptable, as per TfL's pre-application request. In discussion with TfL, Rood Lane has been identified as the best potential location, with City Corporation support. <u>Public realm and healthy streets</u>

	The development is designed to connect well with Leadenhall Market and surrounding pedestrian desire lines, strengthening the site's connectivity and enhancing permeability. The proposed public realm enhancements and pedestrian access are supported in line with London Plan Policies T2 Healthy Streets and D8 Public realm. The proposal to realign the junction between Philpot Lane and Lime Street and widen footways on both roads is also supported. <u>Deliveries and servicing</u> Access for deliveries and servicing vehicles is proposed at grade with four loading bays, and the loading area is proposed to be accessed from Lime Street with vehicles entering and exiting the site in forward gear. TfL welcomes the proposal to consolidate 50% of all deliveries, in line with London Plan Policy T7. It is proposed to have 54 daily delivery and servicing vehicle trips, with7 in the peak hour. TfL has previously requested that night-time deliveries occur only, and restrictions outside the hours of 10pm to 6am are now agreed. The Delivery and Servicing Plan (DSP) should be secured by a pre-occupation condition and discharged in consultation with TfL as an affected highway authority for the TLRN. <u>Construction and demolition</u> The applicant has provided an outline Construction Logistics Plan (CLP). Due to the sensitive location, TfL would prefer a full CLP prior to determination. The applicant has clarified the construction working hours would be 8am-6pm Monday-Friday, 9am-2pm Saturday, and no works on Sunday or bank and public holidays. We have previously advised that a pit lane along Gracechurch Street is not supported. This should be discussed further with TfL prior to determination. The current CLP proposes that in later stages after the main Fenchurch Street pit lane is not in use, Lime Street will become the main delivery point. The applicant is required to provide a more detailed construction vehicle trip generation forecast to help us understand any spare capacity available across the construction programme in the pit lane on Lime Street.

	Swept path analysis showing construction vehicles accessing the loading bay in forward gear has been provided. Notwithstanding final agreement of its acceptability, a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination must be provided. The proposed DSP commits to engage suppliers who are Fleet Operator Recognition (FORS) members. All construction vehicles should be FORS Silver or Gold accreditation. The applicant has confirmed all construction vehicles will also be compliant with CLOCS. The applicant should confirm end of trip facilities and temporary cycle parking will be made available to construction workers. <u>Summary</u> • PCL assessment for all four arms of the junction, and PCL assessment for pit lanes to be secured by pre-commencement condition. • Public access to new pedestrian link to be secured by Section 106 (S106). • Discussion with TfL regarding the proposed access to the viewing gallery; access from the A10 is not supported. • £800,900 s106 contribution to the TfL A10 corridor. • Work with 60 Gracechurch Street development's highway works. • Footway improvements to North East corner of the junction. • May include improvements to both crossings connecting with the North West corner • Confirmation that the Lime Street access RSA followed TfL RSA procedure SQA-0170. • Provide a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination. • Confirm signage and management measures proposed for short stay cycles left overnight • Confirm size of the cycle lifts and stairwell gradient to ensure compliance with LCDS. • Clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided for cycle stands. • £100,000 for new TfL Cycle Hire docking station on Rood Lane. • DSP secured by a pre-occupation condition, discharged in consultation with TfL

	• Full CLP secured by pre-commencement condition, discharged in consultation with TfL committing to Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) standards. • CLP to provide detailed construction trip generation forecast for pit lanes proposed and minimise A10 impact • Provide end of trip facilities and temporary cycle parking for construction workers. **Officer response:** The comments raised by TFL have been addressed by the Applicants and the issues have been resolved.
Transport for London – Crossrail Safeguarding	No comments.
Transport for London, LU/DLR Infrastructure Protection	No comments.
London City Airport	Conditions recommended relating to Construction Methodology (location, height, operating radius and start/end dates for cranes) and Building Obstacle Lighting. **Officer response:** Construction Methodology Condition is recommended, Building Obstacle Lighting Condition has not following a later representation.
Heathrow Airport	No objection.
Thames Water	<u>Waste Comments</u> With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to

	accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents." The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval. With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development, or; 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or; 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents." The developer can request information to support the

	discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval. The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.” Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB There are public sewers crossing or close to your development. If you're planning significant work near our

	sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section. Water Comments Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or 2) a development and infrastructure phasing plan has been agreed with Thames Water to allow

	development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval. The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. "No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure." Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

	https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Thames Water recommend the following informative be attached to this planning permission. "Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development." The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. "No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure."

	Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB Supplementary Comments The accompanying documents contain a flood risk & drainage strategy, there is nothing to confirm points of discharge and split of discharge (if applicable) for both FW & SW, and this is required to confirm if there is sufficient capacity for the proposed development. **Officer response:** Conditions and informatives are recommended.
Surveyor to the Fabric of St Paul's Cathedral	Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of the greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street, it is widely understood that Chapter would be strongly opposed to any development proposals that impinges on kinetic views of the Processional Way, which – if there were any visibility – would have the potential to cause a high level of visual impact and subsequent heritage harm to this Grade I listed building of exceptional significance. We therefore welcome the assurances within the application pack that the proposals now brought forward will not be visible in these views – including confirmation that there is absolutely no 'technical visibility' so often discussed in relation to similar schemes. We are assured by the documentation that the scheme will be invisible. An additional pre-application meeting held Thursday 9th May was of great assistance with regards to understanding how views and impacts on the Processional Way are today assessed and measured with the technology now available. We understand that a more accurate 'worst case scenario' is now taken for testing, with viewpoints taken 30cm from the building line

	in an approximation of how the public interact with this space. We understand that the design changes to the upper levels of the scheme have ensured this 'cloak of invisibility' in the new design. We welcome that the proposed scheme appears to improve on that previously consented in this regard, in-part using the much-improved assessment and visualisation techniques. We would still stress the importance of total invisibility within any views along the Processional Way, which if achieved avoids all adverse visual impact and heritage harm. We request that this is absolutely confirmed by Officers in relation to the proposals, beyond the scenario presented. The proposals will also be appreciable in views from the southeast where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the right-hand side of the Cathedral. LVMF guidance for this view states that 'New tall buildings should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality.' and that ultimately proposals would maintain the visual prominence of the Cathedral and not diminish the ability to appreciate the building as a Strategically Important Landmark. In terms of built heritage, ill-judged development at the site as appreciable in views such as 15B.2 has the potential to cause heritage harm through unacceptably increasing the visual presence of the cluster as a whole, thus challenging the pre-eminence of the Cathedral on the London skyline and the historic and architectural special interest of St Paul's as a Grade I listed building. From recent experience we understand the rate of change occurring within the cluster and those buildings that have been consented between the central core of the cluster and the 'Walkie-Talkie' – 20 Fenchurch Street. We note from the additional pre-application information that the emerging proposals are marginally lower in height than the consented scheme(though would seek this to be confirmed by the project team for the submission scheme). We welcome the decrease in height, even if minor, as this appears to start to deliver a recognition that shaping the overall form of the cluster is a valid concern in terms of urban design. We have concerns regarding the height and massing of tall

	buildings in this area, especially with regard to the nearby emerging scheme for 60 Gracechurch Street. The cumulative baseline, including the recently submitted 60 Gracechurch Street, is somewhat depicted in the application documents. However, given the proximity of the two schemes and the fact that detailed information is now available for both 60 and 70, we would welcome rendered AVRs of both to illustrate the cumulative impact of the proposals – for both schemes. (We would draw Officers attention to our response to 60 Gracechurch Street recently issued, as we suggest that both schemes have an inter-relationship that should be acknowledged). We consider that new proposals in this area should not attempt to use the bulk and mass of 20 Fenchurch Street as a 'datum', thus creating a high 'wall' of built form. Instead we would recommend that the built-form should diminish in height between the centre of the cluster and its edge (as outlined within the application material below). Any decrease and downward gradation in height and massing as part of a considered urban whole should therefore be encouraged. This is a broader urban design and compositional point that we have iterated as part of our response to 60 Gracechurch Street and directly with the City planning team. However, it is concerned with the context that this project and others must establish, given the rate and co-incidence of several major co-related development proposals. <u>Conclusion</u> We welcome the removal of this development from any visible impact on the Processional route and would seek this is absolutely confirmed in all such views. Our view is that decision-makers should examine closely the overall built-form of this emerging expansion of the cluster and consider how to judge regulate the relationship of this development in relation to proposed neighbours. We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward. **Note:** The full response, including images referred to above, can be found online in the Public Access case file. **Officer response:** An officer assessment of the points raised and consideration of the impacts identified above

	are contained in the following sections of this report: Design and Heritage
London Borough of Southwark	No comments.
Royal Borough of Kensington and Chelsea	No objection.
London Borough of Lambeth	No objections.
London Borough of Hammersmith and Fulham	No objection.
Royal Borough of Greenwich	No objection.
London Borough of Tower Hamlets	These proposals are for a new mixed use tall building development comprising ground plus 32 storeys (on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ). The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site (WHS). The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area. The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy. London Plan Policy HC2 sets out that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes. The Outstanding Universal Value (OUV) of the WHS is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its prominence is the townscape is a key component of this value.

	In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 7, 9, 10A, 10B, 10C and 10D. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it. The proposed development raises concerns about the degree of visual separation between the eastern cluster and the Tower of London. This was similarly raised in response to a previous development on the site, COL ref 20/00816/FULEIA. City of London Corporation should consider whether views 9, 10b and 13 should be provided as rendered views, as the proposed development is clearly visible alongside the massing of existing developments in the area. Based on the views reviewed, it is concluded that the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. As similarly raised in objection to the proposed development at 60 Gracechurch Street (24/00743/FULEIA), LBTH is concerned that the Tower of London WHS has already reached its limit in terms of visual intrusion and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS. <u>EIA STATEMENT:</u> LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the Proposed Development at the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where not addressed.

	With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.22 of Chapter 3. The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Climate Change and Greenhouse Gas, Solar Glare and Built Heritage. The following aspects and matters that could affect LBTH will result in significant adverse effects, however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate. With respect to other aspects and matters that could affect LBTH including Townscape and Visual Impact Assessment, and Built Heritage, the ES concluded a single significant effect on LBTH relating to View 7: Tower Bridge Approach – north, which would be moderate beneficial. In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction that should be taken into account in the assessments. It is unfortunate to see that none of those have been considered. City of London Corporation and the Applicant are still advised to refer to these, noting that a planning application has now been submitted relating to 1-10 Bishops Square (One Spitalfields) site under LBTH reference PA/24/01198, a site which sits within the indicated 1km radius identified by the Applicant. A Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) has been provided within Volume 2 of the ES. Part 1 of the TBHVIA assesses the likely significant effects of the Proposed Development on townscape and visual receptors. No townscape receptors have been identified within LBTH. The following visual receptors within LBTH have been identified and considered in the assessment, noting that Views 7, 10A, 10C and 10D have been provided as render images while remaining ones are wireline in TBHVIA: · View 7: Tower Bridge Approach – north

	· View 8: Tower Bridge Approach looking over the workshop · View 9: Tower Wharf – east of Henry VIII's Watergate · Views 10A, 10B 10C and 10D within the Tower of London · View 13 LVMF 10A.1 | Tower Bridge: the north bastion Limited discussion on demolition and construction effects has been provided in paragraphs 6.1-6.5 of Section 6 of Part 1 of the TBHVIA. No details of the effects on individual receptors have been provided. From the above list of visual receptors, only View 7: Tower Bridge Approach – north will experience a significant effect amounting to moderate beneficial, both during operational and cumulative scenarios. LBTH welcomes the use of winter photography for the relevant views where necessary so that full impact from the Proposed Development can be understood. However, the TBHVIA concludes different effects conclusions for View 10A within the Tower of London stating that there would be no effect during spring, summer and autumn and negligible-minor neutral effect during winter. It is considered that all effects should be reported on a worst-case basis and as such it is not considered necessary to split the effects. Nonetheless, the stated effect during winter is agreed. Appendix A provides details on supplementary non-verified views. LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (As shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020) has been included as View A10, which is welcomed. The images produced demonstrate that the Proposed Development would not be visible from this view. Part 2 of the TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. For receptors within LBTH, this includes the Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and grade I listed Tower Bridge. The Tower of London's designation as Scheduled Monument is only mentioned in the TBHVIA, however, it appears that no assessment on such particular designation has been carried out.

	The ES concluded that there would be no effects during demolition and construction, and operation on any built heritage receptors within LBTH. It should be noted that the assessments within the Townscape, Built Heritage and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects. Therefore, in terms of the ES, LBTH has no objections in relation to the aspects listed, on the basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulations. **Officer response:** This is addressed in the Design and Heritage sections of this report.
CoL, Pollution Team	Conditions relating to roof terraces, amplified music on roof terraces, Scheme of Protective Works (Demolition and Construction), sound insulation, fume extract arrangements, plant, structure-borne sound/vibration, site contamination, ground/surface water pollution, de/construction logistics, NRMM compliance and ventilation/extract maintenance. **Officer response:** Conditions are recommended.
CoL, District Surveyor's Office	The DSO reviewed the fire statement and had no comments to make. The proposals are considered to comply with London Plan policies D5 and D12.
CoL, Lead Local Flood Authority	Conditions required on the details of SuDs and their maintenance. **Officer response:** Conditions are recommended.
CoL, Contract and Drainage Service	Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being; Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water Utilities Ltd or their contractors.

	I would be obliged if you could incorporate this in your response to the planning department, regarding this application

Letters of Representation

43. In accordance with the SCI, notification letters were sent on 09 September 2024 to residential properties in the vicinity in addition to the site and press notices as set out above.

44. Two letters of objection were received as a result of this consultation. The issues raised are summarised as follows:

Comment	Officer Response
The development would result in further strain on utilities.	A utilities statement has been provided with the application. Details of utility connections are required through S106 obligation.
The development would generate pollution.	The City's Environmental Health Team have recommended conditions.
There would be increased late-night disturbance.	Conditions are recommended relating to Noise and vibration from plant, Odour, Servicing hours, Roof terrace - hours and management, Noise insulation.
There is an oversaturation of offices on the market.	The need for further office space within the City is addressed within the Land Use section of this report.
The development would overshadow Leadenhall Market and residential properties.	Addressed in the Daylight and Sunlight section of the report.
Detrimental impacts from construction, including noise and pollution.	Conditions are recommended relating to the submission of a Demolition Management Plan and Construction Management Plan.
Redevelopment of a relatively new building.	This is discussed in the Sustainability section of the report.
The consultation process of the previous scheme was poorly managed.	This is not relevant to the current proposals.

45. Not all the representations above are material planning considerations. Those that are, have been dealt with in this report.

Consultation – January 2025

46. A second round of consultation was initiated on 19 December after the receipt of an addendum to the Environmental Statement.

47. Nearby residential occupiers were notified directly of the addendum by letter on 23 December 2024, with a closing date for comments on 06 February 2025.

48. The application was advertised in the press on 07 January 2025.

49. Site notices advertising the planning application were posted in 6 locations around the site on 09 January 2025.

50. The following representations have been made pursuant to the second round of consultation:

Consultation Responses	
GLAAS, Historic England Archaeology	No further comments.
TfL – Crossrail Safeguarding	No comments.
TfL – LUL/DLR Safeguarding	No comments.
Heathrow Airport	No objection.
London City Airport	No objection subject to a Construction Methodology condition being attached. LCA rescinded their previous request to attach a Building Obstacle Lighting condition as, upon further investigation, the proposed development would no longer be considered an obstacle. **Officer Response:** Condition recommended.
Environment Agency	No comments.
Health and Safety Executive	No comments.
NATS Safeguarding	No objection.
Thames Water	No further comments.
Port of London Authority	No comments.
London Borough of Lambeth	No objection.

51. A second round of notification letters were sent to residents on 23 December 2024, alongside a site notice posted on 09 January 2025 and a press notice published on 17 January. As of the print deadline, no further representations have been received after this consultation.

Policy Context

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

53. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, awaiting Examination in Public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

54. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of very limited weight and will not be referred to in this report.

55. Government guidance is contained in the National Planning Policy Framework (NPPF) 2024 and the Planning Practice Guidance (PPG), which is amended from time to time.

56. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise". Other relevant sections of the NPPF are set out in the following paragraphs.

57. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

58. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development." That presumption is set out at paragraph 11. For decision-taking this means:
    a) approving development proposals that accord with an up-to-date development plan without delay; or
    b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
    - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

59. Paragraph 49 states that "local planning authorities may give weight to relevant policies in emerging plans according to:

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

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

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

60. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

61. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

62. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

63. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lives, through promoting good health and preventing ill-health.

64. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

65. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting

from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

66. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

67. Paragraph 117 states that “applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

68. Paragraph 118 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

69. Paragraph 125 (c) of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

70. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

71. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and

distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

72. Paragraph 136 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'

73. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

74. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

75. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.

76. Paragraph 166 states that, in determining planning applications, Local Planning Authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

77. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development

affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

78. Paragraph 210 of the NPPF advises, "In determining applications, local planning authorities should take account of:

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

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

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

79. Paragraph 212 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".

80. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

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

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

81. Paragraph 215 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

82. Paragraph 216 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required

having regard to the scale of any harm or loss and the significance of the heritage asset".

83. Paragraph 219 of the NPPF states "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

Statutory Duties

84. The Corporation, in determining the planning application has the following main statutory duties to perform:
    - To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);

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

85. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

Considerations

86. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.

87. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

88. The principal issues in considering this application are:

    - The economic benefits of the proposal;
    - The appropriateness of the proposed uses, including the new cultural offer;

- The appropriateness of a tall building on site;
- The appropriateness of the architecture, urban design, and the new public realm;
- The impact on strategic views in the London Views Management Framework and on other strategic local views;
- The impact of the proposal on the Tower of London World Heritage Site;
- The impacts of the proposal on the setting and significance of heritage assets;
- The potential impacts of the development on buried archaeology;
- The acceptability of the proposal in accessibility terms;
- The acceptability of the proposed highway and transportation arrangements including servicing, cycle parking provision and impact on highways;
- The acceptability of the scheme in terms of its environmental effects including wind microclimate, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability;
- The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise and vibration, overlooking, daylight and sunlight, solar glare, and light pollution;
- The outcome of the Health Impact Assessment;
- Acceptability of the sustainability credentials of the scheme including appropriateness of the demolition of the existing buildings on the site;
- Acceptability of the proposed security, suicide prevention and fire safety arrangements;
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 215 balancing exercise;
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act; and
- The requirement for financial contributions and other planning obligations.

Economic Issues and the Principle of Development

89. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity, and significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Significant weight is given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.

90. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.

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

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

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

94. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace is therefore required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

95. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

96. London Plan Policy GG2 sets out the mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design–led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.

97. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

98. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

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

100. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, at policy DM1.2, further

encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

101. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy and enhancing the City's evening and weekend economies; creating new and enhanced culture, leisure and visitor attractions; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; delivering new, inclusive open spaces and enhancing the City's public realm for everyone; delivering urban greening and greater biodiversity; and creating an inclusive, healthier and safer City for everyone.

102. The emerging City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

103. The application site is situated within the Eastern Cluster as defined in the Local Plan 2015 and the City Cluster as defined in the emerging City Plan 2040. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The emerging City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.

104. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the

construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.

105. The Strategic Objective in relation to supporting a thriving economy within the emerging City Plan 2040 states that to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

106. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are further reflected in the Corporations 'Destination City' vision for the square mile.

107. The proposed scheme would deliver on the City's strategic objectives and support the City's economic role by providing a substantial and strategic contribution of 78,711 sqm (GIA) of flexible Class E (office) floor space alongside a complementary retail and cultural offer and new public realm.

Land Uses

108. This section of the report provides an overview in respect of the proposed site composition and mix of uses before appraising the acceptability of the proposed uses and the loss of existing uses where relevant.

109. The proposed building has been designed to provide a flexible workplace-led mix of uses. The 32 storeys above ground predominantly provide office use (Class E) with flexible retail use (Class E plus Sui Generis drinking establishment and hot food takeaway) at lower ground mezzanine and ground floor levels. A public viewing gallery (Sui Generis) is located at level 32, accessed from the Basement Level 01 which provides amenity for City workers, residents and visitors. At the south east corner of the ground floor, permeability is enhanced to Fenchurch Street and Lime Street and there is increased permeability through the site from north to south with the introduction of a new publicly accessible route through the proposed development.

110. A breakdown of the existing and proposed land use split (GIA) is set out below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net change GIA (sqm)
Office (Class E(g))	**20,314**	**78,711**	**+58,397**
Retail/Food and Beverage (Class E(a)-(b))	**7,757**	**195**	**-7,562**
Cultural space/Public Viewing Gallery (Sui Generis)	**0**	**1,273**	**+1,273**
Total	**28,071**	**80,179**	**+52,108**

111. The following sections of the report provide an assessment of the proposed uses.

Provision of Office Accommodation

112. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

113. The predominant use of the proposed development is office space, comprising of 78,711 sq.m (GIA) of Commercial/Office Floorspace Class E(g) (a net gain of 58,397 sq.m of office floorspace on this site). The office space is classified as best-in-class, Grade A office space.

114. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. This policy sought to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. This is based on evidence derived from a study conducted by ARUP/Knight Frank on behalf of the City Corporation, which identified the demand or 1.2 million sqm based on a 'hybrid peak' model of

workplace attendance, and demand for 1.9 million sqm where there was a 'return to in-person'. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.

115. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. 370,000sq.m of flexible office floorspace was approved in 2022.

116. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000-770,000sq.m. The proposed development would deliver a significant amount of this floorspace target for the City Cluster, providing a net uplift of Grade A office floorspace of 58,397 sq.m, equalling approximately 4.86% of the entire City Plan target.

117. The proposed office spaces are designed with a range of floorplate sizes to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of exterior environment amenity, floor area, and choice of outlook. The proposed development seeks to provide roof terrace spaces for the use of office occupiers at podium and roof levels, these spaces would provide high quality amenity space to City workers and would contribute to the urban greening of the building. This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

118. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. An Affordable Workspace Management Plan would be secured by condition, which shall include details of specification, layout, facilities, operation and management.

119. The central part of the ground floor hosts the double-heighted office entrance lobby and reception, from which escalators and lifts provide access to the main lobby at the first floor. The lobby has frontages and access to both the proposed passageway and Fenchurch Street. Levels 2-31 provide office floorspace with associated facilities.

120. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in

delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a substantial uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed Retail

121. The site is located within a Principal Shopping Centre (PSC). Policy DM20.1 pf the Local Plan 2015 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Policy DM20.4 of the Local Plan 2015 states that proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated and policy CS20 states that new retail development should be focused on Principal Shopping Centres so that they become attractive shopping destinations. Policy S5 of the emerging City Plan 2040 supports proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand and supports provision of retail uses that provide active and publicly accessible frontage across the City where they would not detract from the viability and vitality of the PSCs.

122. The existing retail floorspace on the site is 7,757sq.m (GIA), it is occupied for retail use at lower ground, ground and first floors.

123. The proposed retail floorspace comprises 195sq.m (GIA) of flexible retail space for a flexible mix of shops, cafes and restaurants (Class E(a)-(b) to ensure the building can respond to market demand.

124. There is a significant loss of retail floorspace, 7,562sq.m, contrary to policy. Under policy DM20.1 and emerging policy RE1, the amount of active retail frontage remains largely the same due to the new pedestrian route through the building. There is existing 75m of active ground floor retail frontage and it is proposed that there would be 78m of active retail frontage at ground floor level. The policy is to resist the loss of retail frontage and floorspace.

125. The application proposes that the ground floor and part of the lower ground floor would prioritise a mixture of publicly accessible space and retail space as well as entrances for the areas on upper floors. At the western part of the ground floor, a large retail space is provided to the south-west section of the ground floor, fronting Gracechurch Street, Fenchurch Street and the proposed passageway. This space has frontages to the west, south and east facing frontages. The eastern part of the ground floor would be multifunctional. The space is proposed to be entirely open to Fenchurch Street and Lime Street at

ground floor to the east which accommodates a large piece of public realm in the daytime, suitable in part for retail pop up uses to provide further dynamic enhancement and activation to this space. The lower ground floor provides publicly accessible toilets.

126. The site is located in the Leadenhall Market Principal Shopping Centre (PSC) as identified in the Local Plan. Policy DM20.1 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and that development should maintain a clear predominance of shopping frontage within Principal Shopping Centres.

127. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, close to the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives met include provision of a new publicly accessible viewing platform providing higher level views and public areas, in line with emerging City Plan policy.

128. Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level increases slightly. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontages on Gracechurch Street and Fenchurch Street, and increase the permeability into the building through the creation of two pedestrian routes. One of these spaces could be used to provide pop up retail, contributing a further 580sq.m of retail space. The proposed development would provide flexible retail floorspace at ground floor across key frontages and at lower ground mezzanine level. The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of the Principal Shopping Centre. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster. This space is flexible and would utilise the same space as the service entrance and so is considered on a flexible basis and is not permanent retail. On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. However, the development

proposed, would be contrary to adopted Local Plan Policy CS10, DM20.1 and Emerging City Plan policy RE1. A condition is recommended to secure retail uses falling within Class E as proposed, and to prevent the change to any other use within Class E.

Proposed Cultural Offer

129. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:

- Providing, supporting and further developing a wide range of cultural facilities including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries.
- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
- Protecting existing cultural facilities where they are need.
- Providing visitor information and raising awareness of the City's cultural and heritage assets.
- Allowing hotel development where it supports the primary business or cultural role of the City.

130. The emerging City Plan 2040 under Policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

131. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

132. A cultural plan has been submitted for the proposed site in accordance with Policy CV2 of the emerging City Plan 2040. The plan analyses the City's existing cultural infrastructure and sets out the applicant's vision to provide a

multifunctional environment over three cultural spaces in the City for a variety of cultural uses, such as art exhibitions, community events, market spaces, and interactive displays where visitors could engage with local history and the work of young and emerging artists from across London. The Cultural Plan for the site was prepared by Hatch and informed by research into the City's cultural provision, to identify gaps in provision as well as to help inform the development of a cultural offer that would complement as opposed to compete with the existing cultural offers available within the vicinity of the site, including Leadenhall Market and other nearby consented schemes.

133. The submitted Cultural Plan seeks to balance consideration of cultural infrastructure need, wider societal benefits of culture and the essential role that hospitality and tourism sector businesses play in supporting thriving cultural destinations, and this approach has informed the development of the cultural offer for the scheme and the identification of prospective occupiers and delivery partners. This was in addition to undertaking engagement with cultural sector stakeholders and key industry specialists in Art Exhibitions, Creative Workspace and Social Enterprise Food Business. The engagement with these cultural stakeholders identified a strong interest in the site and highlighted an unmet demand for well-equipped and functional cultural space in the City for both consumption and production.

134. The Cultural Vision outlines its strategy for the development based on utilizing different levels of the proposed development in line with the following initiatives at each level.

Lower Ground Level

135. The lower ground level would provide a multifunctional space for various art installations, from immersive digital projections, to interactive displays exploring local history to traditional art exhibitions. This would be a flexible 'black box' design to allow for diverse artistic displays to be programmed and iterated overtime, and would enable showcasing local creative works, enhancing the visitor experience and supporting local emerging artists, and could be further adapted for community events, functions and public activities including seminars and panel discussion, skills training and community workshops. This level would share space for retail and F&B uses to compliment the exhibition space.

Ground Floor Level

136. The ground floor level would feature a new pedestrian passage through the site, from Fenchurch Street to Ship Tavern Passage, improving access and footfall to Leadenhall Market, and generally contributing to the network of exciting and engaging pedestrianised routes in the City. A digital media wall would be displayed within the new passage, helping to further draw in visitors and would display visual content including interpretations of local heritage,

such as images of the site's early history and its ancient links to the Roman Forum, as well as contemporary digital art curated from local artists.

137. There would be a new covered public realm space at the corner of Lime Street and Gracechurch Street which would be used for a range of pop up uses such as exhibitions, performances, experiential retail events and markets. The ground floor space at the intersection of Gracechurch and Fenchurch would feature a flexible retail/food and beverage space and would be designed to complement the overall cultural offer.

Level 32

138. A public viewing gallery would be provided at the top of the building, contributing to the network of free to access elevated public spaces across the City for the use of the City residents, workers and visitors. The viewing gallery would provide opportunities for enrichment within the public viewing gallery, including supporting art exhibitions, public events and wellness activities. A food/beverage offer would further animate Level 32, encouraging repeat visitation and creating further opportunities for social impact businesses.

139. Given the duration of the construction programme and project completion date for the scheme it is considered premature to 'lock in' a cultural operator for the site at this time, and therefore delivery partners would be scheduled closer to the construction phase of the development. Notwithstanding this, preliminary consultations with local stakeholders have been conducted to understand the current needs and requirements of the sector. These consultations have provided insights that have shaped the development of the cultural plan, and it is expected that the following delivery partners would be expected to ensure efficient and effective operation of the cultural offer:

a) **Retail/Food & Beverage Occupier:** One or more partners would manage the Ground Floor space under lease agreement and hospitality offering at Level 32. Opportunities for partnership with a social enterprise would be explored to support community-oriented operations and potential rate relief benefits, supporting the ongoing viability of this space.

b) **Art Exhibition Curator:** One or more partners would oversee the selection, procurement, management and marketing of periodic art exhibitions across all designated cultural areas. This includes curating available spaces at Ground Level, Lower Ground, and the Level 32 gallery, as well as programming for the digital media wall. It is anticipated that this operator would be one of the following groups:

- An Arts Charity focused on exhibiting works by emerging London artists
- A creative higher education institution which exhibits student work

- An arts museum or cultural institution which exhibits items from its collection

c) **Market Operators:** One or more partners would be appointed to co-ordinate the scheduling of events in the outdoor market area, bringing expertise in managing successful market environments focused on food and arts and craft sale.

140. These partners would collaborate with building management, who would take carriage of other aspects of the cultural offer including Level 32 security and management of external public areas. To maximise local employment and community benefits, all prospective delivery partners would be evaluated based on social impact selection criteria. Given the timescales involved, the spaces are designed with flexibility and are indicative at this stage, and whilst specific cultural users and delivery partners have been identified, this may change subject to the evolving needs of cultural occupiers.

141. A Cultural Implementation Strategy would be secured in the S106 agreement to secure a year-round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users. Final details of the design, operation and management of the digital wall would be required by condition and within the S106 agreement.

142. It is considered that the proposal would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda, CS11 of the Local Plan 2015 and policy CV2 of the draft Local Plan 2040. The proposed Cultural Plan and its intended actions are welcomed and would be secured by condition and through the S106 agreement to ensure that the benefits are delivered in accordance with policy CS11 of the Local Plan.

Proposed Elevated Public Space

143. Local Plan 2015 policy DM10.3 and draft City Plan 2040 policies S8, S12 and DE4 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.

144. Policy D9 (D) of the London Plan states that ‘free to enter publicly accessible area should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London’.

145. A new public viewing gallery is proposed at level 32 and would be comparable in size and intent to the previous consent for the site. The elevated public space and associated public amenity would be accessed from the ground floor via an entrance on Gracechurch Street and a second entrance in the new public passageway. Upon arrival, visitors would be required to travel down to basement level using the grand stair or lifts in the northern area of the entrance to take lifts to the viewing gallery at level 32. The journey from ground level, to basement level to level 32 is intended as an integrated experience with activities available at all three levels; a flexible space alongside the entrance at ground level, an immersive gallery and community room at basement level all supporting the flexible space at level 32 and the outdoor terrace.

146. The combination of the public viewing gallery, enclosed supporting amenity area for exhibitions and events, seating and landscaping and a food and beverage offer would result in an elevated public space of the highest quality, providing dynamic views across the western part of the City of London, providing a valuable space for culture as well as expansive views over London for all to enjoy.

147. The elevated public space would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later. The number of people the space could accommodate at any one time would be carefully managed (and secured via a management plan) to ensure evacuation and safety of all those visiting, with tickets bookable including 35% walk-ups. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the lower ground floor with dedicated lifts and security checks.

148. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

149. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan and the use of the public viewing gallery and winter garden would be discussed and secured under the Section 106 negotiations and agreement.

150. The proposals for the elevated public space are in accordance with Local Plan policy DM10.3, draft City Plan 2040 policies S8, S14 and DE4, which seek the delivery of high-quality, publicly accessible elevated viewing spaces.

Land Use conclusion

151. Strategic Policy S21 of the City Plan 2040 supports the development of new tall buildings together with complementary land uses, transport, public realm and security enhancements to accommodate a significant growth in office floorspace and employment, through increasing the provision of attractive world class buildings that offer a range of office accommodation to cater for the needs of varied office occupiers and encouraging complementary leisure, culture and retail uses to support the primary office function.

152. The proposed development for a significant increase in Class E office floorspace accords with the primary strategic aim of the Local Plan 2015 and the emerging City Plan 2040, being to deliver new, Grade-A office floorspace to maintain the City's position as the world leading international finance and business centre.

153. The London Plan policy D3(a), encourages a design-led approach to optimise the best capacity of land by ensuring that development is of the most appropriate form and land use for the site, and in policy E1(a) encourages the improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. The London Plan policy SD5 reinforces the importance of office floorspace within the Central Activities Zone (CAZ) (which the site sits wholly within) and encourages intensification of office floorspace within the CAZ through redevelopment and refurbishment.

154. Local Plan 2015 policy CS1 seeks to ensure the long-term provision of office floorspace of the highest quality.

155. The provision of an additional 78,711sq.m (GIA) of Class E office floorspace is therefore welcomed in the spirit of the aims of the adopted Local Plan 2015 and emerging City Plan 2040, and Officers consider that the site has been optimised in line with the aims of the London Plan policy D3.

156. The provision of the cultural floorspace is also welcomed in the context of emerging policy S6 (Culture and Visitors) and the Destination City initiative. The provision of retail/F&B floorspace to complement the other proposed uses on site as well as neighbouring commercial and residential uses is also welcomed.

157. Overall, it is considered the proposed development is in accordance with policies CS1, DM1.2, DM1.3, DM1.5, DM10.3 CS11, CS20 and DM20.4 of the Local Plan 2015, policies S4, OF1, S5, RE4, S6, DE4, CV2, CV3, CV5, S8, S12, and S21 of the emerging City Plan 2040, as well as the aims of the London Plan, in delivering growth in office floorspace and employment.

Design and Heritage

158. The relevant Local Plan 2015 policies for consideration in this section are CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.4, CS13, CS14, CS16, DM16.1, DM16.2, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, DE5, DE8, S9, AT1, S11, HE1, HE3, S12, S13, OS2, and London Plan (2021) Policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4 and GG1-3, GG5, GG6.

Principle of a Tall Building

159. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan Policy D9 (A).

160. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

161. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan 2015 seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

162. The application site is within the 'Eastern Cluster' policy area in the adopted Local Plan (2015) (CS7, fig G), located in the south-west corner of the policy area. The application site is not in one of the areas identified as inappropriate for a tall buildings, as shown on Figure N of the 2015 Plan. The proposal therefore draws in-principle support from policies CS7 and CS14 (1) which encourages the delivery of tall buildings on suitable sites within the Cluster.

163. In the emerging City Plan 2040, the proposal is within the City Cluster Tall Buildings Area (fig. 14) and the City Cluster Key Area of Change (fig. 27) and would comply with the relevant contour lines of the proposed City Cluster; it would, in the language of policy S12 (3), mediate successfully between the adjacent 140m and 160m contour lines, with the massing of the proposal stepping up towards the east side of the site and reaching 149.67m+AOD at its highest point. The proposal would be in the City Cluster Key Area of Change and would draw in-principle support from emerging policy S21, the proposal would accord with all relevant provisions of this policy. However, the emerging

City Plan 2040 has not yet gone through Examination in Public and is therefore a material consideration to which is afforded limited weight.

164. For the aforementioned reasons the proposal site is identified as suitable in principle for tall building development and the proposal would therefore comply with D9 B (3). Further to this, an assessment against London Plan policy D9 (C) and (D) is made below, with reference to other sections of this report for more detail. The proposals would comply with these parts of the policy, leading to compliance with D9 overall.

165. As such, officers consider the principle of a tall building to be suitable on this site and for the proposal to draw support from and comply with London Plan policy D9, Local Plan policies CS7 and CS14 and emerging City Plan 2040 policies S12 and S21.

Tall Building – Impacts

166. This section assesses the proposals against the requirements of policy D9 C (1-3) and D of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment of the architectural approach and design details follow on below.

167. The proposal would be read as part of the consolidating City Cluster, positively contributing to the definition of its south-western edge. The height and form of the proposal has been amended following the submission and approval of the previous consent for the site, and pre-application meetings to ensure a sensitive relationship with the Cluster, the wider London skyline, historic skyline features, local views and the significance of heritage assets.

168. The proposal has been designed with the future evolution and consolidation of the Cluster in mind. In strategic London-wide and riparian views, the proposal would help to mitigate the somewhat assertive presence of 20 Fenchurch Street as an outlier from the Cluster.

169. The siting and height of the proposal, to the northwest of 20 Fenchurch Street, would help to fill the gap between the taller cluster to the north and 20 Fenchurch Street to the southeast, it would sit lower than its proposed neighbours, consolidating the cluster with due consideration for its overall tall building composition. The proposals would, in most views, particularly those riparian views, allow 20 Fenchurch Street still to read as a subsidiary ‘peak’ in height at this point in the Cluster. The proposed tower with its refined and elegant facades would help to counterbalance the singular presence of 20 Fenchurch Street, subduing its currently outlying presence on the skyline, and would help to articulate the overall skyline of this part of the Cluster in the baseline and cumulative scenarios.

170. The height of the proposal would mean that it would be visible in north westerly views available from the Sky Garden at 20 Fenchurch Street, the proposal would sit lower than the sky garden in the foreground of views towards other tall buildings in the eastern cluster. Its impact would be largely similar to that of 6-8 Bishopsgate. The proposal would add to the visual interest of this view and it would not detract from the viewing experience or the visibility of key landmarks such as St Paul's Cathedral. The proposed elevated public space in the scheme provide northwesterly views through the provision of another high quality viewing gallery.

171. The proposal would relate appropriately to the emerging and consolidating Cluster, with its height of a scale commensurate with the stepping down from the apex of the Cluster at 22 Bishopsgate. The height has been specifically modelled to create a gentle undulation among the rooftop heights of the existing and consented neighbouring towers along Gracechurch Street and Bishopsgate, that step down towards the river before a final, subsidiary peak at 20 Fenchurch Street. Officers consider it to strike the right balance in transitioning scale down from the apex towards the river. Such an approach to the future form of the Cluster has been informed by extensive 3D modelling and architectural refinement to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.

172. The proposal is, comparatively, of a more modest height than some of the other existing and consented Cluster towers, listed here in descending AOD order:

- Undershaft: 309.6 AOD (2024 resolution to grant)
- Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m
- 100 Leadenhall 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 60 Gracechurch Street: 162m (resolution to grant)
- 85 Gracechurch Street: 155.70m
- **70 Gracechurch Street: 149.67m (the proposal)**

Visual impacts:

a) the views of buildings *from different distances:*

173. Of the long range views D9 C (1; a; i), these have been tested in the THVIA July 2024 views Nos. 1-6, 11, 17, 30-43 and A1-5, A10-19 and the addendum in December 2024, and their respective Appendices. Following representations made to the EIA scoping and initial consultation by Tower Hamlets and a review by CoL officers of the THVIA pack, it was decided that the information provided by the applicants that there was sufficient information in the application documents to understand and analyse the impact of the proposals. Some of the comments received from statutory consultees, including Historic England, St Paul's Cathedral and Tower Hamlets, relate to the views provided in the THVIA, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections.

174. In all relevant LVMF views, the proposal would preserve the setting of St Paul's Cathedral and the Tower of London as the Important Landmarks, as well as the composition, features and characteristics of the LVMF views. The proposals height, overall shape and architectural approach have been carefully considered so the proposed design responds to its location and visibility against designated heritage assets whilst consolidating an overall coherent shape to the City's skyline. In LVMF views, where visible, the proposals would be read against 20 Fenchurch Street, sitting as a smaller neighbour to its north, helping to consolidate the skygap between the existing cluster and 20 Fenchurch Street. In views of the Cathedral and the Tower of London, the proposal would make a positive contribution to the existing and emerging skyline. In relation to long range views, the development would comply with Policy D9 C (1 a; i).

175. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in THVIA Views no. 7-10, 12-16, 18-21, 24 and 25. Some of the comments from statutory consultees, including LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

176. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would comfortably integrate into the Cluster and would help to reinforce and define its overall silhouette and form. From the southwest, including from Millenium Bridge and London Bridge, the development would appear as a striking new part of the southwestern periphery of the Cluster, lower than 20 Fenchurch Street.

177. From the north and west, the observer would begin to experience the tower's elegant and refined form. From the southwest, south and east, the south elevation would be visible, and in views from the east the eastern elevation would be seen. Particularly from the west and southwest, viewers would perceive the stepped form of the southern elevation and its vertical seams, this detail would add richness and depth. The proposed tower would provide visual

interest in each of these views adding positively to the Cluster's skyline presence. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

178. In relation to immediate views, (London Plan D9 C (1; a; iii)), THVIA views 15, 21-23, 26-28 and 31 illustrate the closer range views of the building and how the building is experienced at street level from Gracechurch Street (north and south), Lime Street, Fenchurch Street, Eastcheap, Botolph Lane, Lombard Street, Bank Junction, among others.

179. Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall buildings with a landmark status, including 20 Fenchurch Street. While these immediate views would change, the proposed building, both its base and the tower, would be high quality and form a positive relationship with the street, creating a comfortable pedestrian scale which coherently adjoins its surroundings and historic context. In addition, the proposed building would add vitality to the street through clear glazed active facades. The proposed pedestrian route, would add visual interest, activity and vibrancy in the most immediate views. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

180. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would reinforce the Cluster's skyline form, which would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

181. In relation to D9 C (1; c), the architectural quality of the facades is exemplary and would be maintained throughout its life span. The tower would be visually split into two parts: the ground floor podium, with a tower above. An initial palette of materials has been specified on the application drawings, with conditions to secure their final details and finishes. These indicative materials are considered to be high quality, appropriate exemplary detailing would be required of a building in of such prominence. Overall, the architecture is well-considered, it would be an attractive addition to the skyline, and is considered to comply with D9 C (1; c).

182. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage and Views sections of the report. Officers have identified no harm to any designated heritage assets.

183. For the reasons set out in this report, it is considered that there is clear and convincing justification for the proposed development. It would optimise the capacity of this site and deliver an essential contribution to the provision of required office space as set out in the land use section of the report.

184. To optimise the site, while avoiding harm, alternatives were explored throughout an iterative process, starting from the massing of the previous tower permission on the site. This included different massing profiles, silhouettes and shapes, with the massing of the tower particularly sculpted to make in invisible in the Fleet Street views and achieve a quiet charisma within the Cluster. The elevational treatments had several iterations and went through a process of refinement, seeking to create interesting and engaging street level views. While the proposal would have intervisibility with a number of heritage assets, its quiet architectural charisma and careful massing would give it a comfortable presence in all relevant viewing experiences of them. The proposal is considered to comply with D9 C (1; d).

185. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by views in the THVIA. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic siting within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).

186. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. Rising to a total height lower than 20 Fenchurch street, which sits closer to the river than the application site. Due to its location towards the south west edge of the cluster, its distance from the river, as well as its strategically driven height, it would preserve the open quality and views of/along the River, avoiding a ‘canyon effect’ when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).

187. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be moderate-major adverse with a potential significant effect to receptors on Fenchurch Street, but negligible-minor adverse for all other receptors (with no significant effects), as discussed in the relevant section in this report. Details of materiality and other design details would assist in mitigating these impacts. Further details would be requested as a S.106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary), in addition to an agreed set of additional testing locations as part of the façade materiality to be secured through the S.106

obligation. The proposed development would comply with Policy D9 C (1; g) of the London Plan.

188. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which require a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with London Plan policy D9 C (1; h).

Functional Impact

189. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, and are considered to be in accordance with London Plan Policy D9 C (2; a).

190. The proposed servicing strategy would be similar to the consented scheme, with some minor differences. This area would function as a dual-purpose area, making an efficient use of the available ground floor space. During the daytime hours (06:00 to 22:00), the area will be used as a public realm space, whereas during overnight hours (22:00 to 06:00), it will be facilitating delivery, servicing, refuse and recycling activities. There are servicing bays in this area to accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis were undertaken, showing that vehicles can access and egress the loading bays. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

191. The proposed development creates several pedestrian access points, for each use; the main access for office workers would be Fenchurch Street and the proposed pedestrian link through the centre of the base, with accesses to the cultural use and retail use on Gracechurch Street and the proposed pedestrian link. The rooftop viewing gallery, both the internal and external space, would be accessed by an arrival space at ground floor level, with circulation space and additional cultural/amenity space at lower ground floor level with lifts up to the rooftop. This area would be the main point of arrival for visitors of the elevated public spaces. The arrival space for the rooftop viewing gallery would be able to accommodate a space for a security check if required, which connects to a passageway leading visitors to the lift for the public spaces. The

public rooftop spaces have been designed to accommodate up to 333 members of the public based on fire capacity, with lifting, access and supporting functions designed around this expected occupancy. The split level foyer space has been generously sized to accommodate visitors to the public areas. This would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. This is in accordance with D9 C (2; c). For cyclists, an access on the east side of the building facing Lime Street would be provided, leading into a lift lobby and stairs with three lifts that take cyclists to the basement cycle store area.

192. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the public highway which will be developed in detail as part of the S278 agreement. This would include widening footways, junction improvements and resurfacing public highways to enhance walking and cycling on Gracechurch and Fenchurch Street. The S.106 agreement will require the developer to enter into a S278 agreement with the City of London and the TfL to undertake any works to mitigate the impact of the development in accordance with D9 C (2;d).

193. In particular, the provision of office floor space, the cultural space and the elevated viewing gallery will promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with D9 C (2; e).

194. With the imposition of conditions, no adverse effects have been identified on the operation of London's aviation navigation and the proposals have also been found to avoid significant detrimental effect on solar energy generation on adjoining buildings D9 C (2; f).

Environmental Impact

195. In regard to D9 C (3; a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions and would not compromise the comfort and enjoyment of the public realm at ground floor and private and public terraces of the building. Further details of this assessment are in the relevant sections of the report. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report. It is considered the proposal would meet the environmental considerations of Policy D9 C (3).

Public Access

196. The proposal would provide a striking new elevated public space at the crown of the building. This would provide striking views over central London to the west, south-west and south in the form large external viewing platform incorporating a separate but linked internal space. The proposal would accord with D9 (D).

Tall Building, Principle, Conclusion

197. Overall, officers consider the site to be appropriate for a tall building and a strategic delivery site which supports the consolidation of the City Cluster and, as such, the proposal would comply with London Plan policy D9, Local Plan policies CS7 and CS14 and emerging City Plan 2040 policies S12 and S21.

Architecture

Existing Context and Building

198. The existing building at 70 Gracechurch Street was completed in 2001 and is formed of 8 above ground stories with 4 basement levels. It occupies the entire footprint of a prominent corner plot towards the centre of Gracechurch Street, to its eastern side where the street meets Fenchurch Street. The building was designed by Building Design Partnership (BDP) as a department store with office space above. The ground floor retail unit features primary entrances from Gracechurch Street and Lime Street, with a secondary entrance from Ship Tavern Passage. The office entrance is from Gracechurch Street. The façade is a mix of Jura limestone curtain walling with glazed panel cladding. The corners are articulated with horizontal limestone fins which follow the curved profile.

199. Other than the Swan Tavern, which is set back from the street, the buildings in this terrace have consistent front building line datums, with relatively uniform base proportions, which work together to form a consistent and complete street. Similarly, there is a conformity of building materiality through the use of stone and masonry detailing, proportion and hierarchy, despite these buildings being of different ages and architectural styles. In urban design terms, the scale and proportion of the existing building, and its neighbouring buildings fronting Gracechurch Street, are well-proportioned and exhibit good quality architectural detailing.

200. The curved nature of the building on this prominent corner also helps to lead the eye, and pedestrian movement, around on to Fenchurch street. The curved form is also reflected in the design of the existing 60 Gracechurch Street, which sits on the opposite side of the junction. Working positively together, the curves of these two buildings mark a legible gateway to Fenchurch Street, softening its edges, and enhancing the pedestrian experience of these streets.

201. The ground floor of the application site also offers legible entrances, and an active and human scaled ground floor, which is predominantly clear glazed allowing views into the building, which also provides an active frontage onto Fenchurch Street.

Summary of changes since previous permission (20/00816/FULEIA)

202. In 2020, planning permission was granted for a scheme on this site comprising three articulated glazed volumes on top of a mid-height podium block, with a pedestrian route through the site at ground level, lined with active uses and entry to a rooftop elevated public space. These essential elements are carried forward in the current proposals, but significant revisions have been made to improve the sustainability credentials of the building. The changes can be summarized as follows:

Retention of the existing structure

203. Perhaps the most significant change is that a large portion of the existing building's structure would now be retained, with additional structure for the tower added in various places, and this retention would be reflected in the architectural approach of the base of the building, where existing materials would be re-used as far as possible. The structural retention would amount to approximately 60% of the existing structure and sub-structure (by volume), this is considered positive from a carbon saving and circular economy perspective. The level of structural retention is discussed in more detail in the sustainability section of the report. The lower floors, or the 'base' of the building, have a high level of solidity with horizontal and vertical emphases, a more traditional order than the existing building, and in a similar fashion of the previously consented scheme, though under the current proposals the floor to ceiling heights and the width of fenestration have been dictated by the retained structure behind.

204. The tower design has been updated to account for latest best practice in building design, it would be more sustainable, and its calm design has been welcomed by Historic England in their consultation response. A simplified version of the previously consented scheme, 3 distinct curved volumes appear on the southern and northern facades. These curved volumes have been refined and consolidated when compared to the previously consented scheme. The proposed tower has 3 distinct elements, but these 3 sections have been separated by a squarer corner, with straight vertical emphasis. The proposed tower reads as a simplified and refined version of the previous tower, the buildings form and envelope has been streamlined to reduce the embodied carbon impact of the proposals.

205. The base of the building is slightly taller than the previous consent, and would have an additional floor. The top of the building still incrementally increases in

height towards its eastern edge in 3 ‘steps’, however, the differences in height between each tower element, or step, are smaller between each volume. The uppermost floors in the previous consent were Level 30, Level 32 and Level 34, in the proposed scheme they are Level 31, Level 32 and Level 33 respectively (regarding internal, occupiable space).

Appearance

206. The previous application proposed unspecified masonry facade materials for the base, the current proposals would re-use the jura-limestone on the existing building for the proposed solid elements of the existing building, with new facade panels. The ground level route through would be finished in dark metal, with shopfronts that follow traditional proportions.

207. Both the previous consent and the current proposals would be predominantly glazed, the previous proposal would have had metal fins and terracotta spandrels with an offset fenestration order. The proposed tower would have a simplified design, with horizontal white metal spandrel panels instead of white terracotta, and a more ordered, rectilinear fenestration pattern which would not be offset.

Pedestrian Route

208. The route through the building at ground floor level would remain, although it has been re-aligned to be slightly diagonal across the building footprint. It has been arranged to terminate more visibly on the junction of Fenchurch Street and Gracechurch Street, this is considered and improvement on the previous application. A large entrance to the route on the south elevation would be prominent in views of the building from the south. The design and appearance of the route has changed, as have the activities which line it. The entrance to the curated cultural space would flank the western edge of this pedestrian route. The presence of a digital art screen would tie in with this cultural use, and create a publicly accessible new part of the City on the edge of Leadenhall Market.

Cultural Offer

209. In the previous consent, a publicly accessible cultural ‘forum hall’ space would have been provided at ground level on the southwest side of the building. A separate viewing gallery entrance would have been on the northwest corner, this would have provided access to a double height viewing gallery at level 29.

210. In the current proposals, the public amenity space entrance would remain on the northwest corner, retaining its visual prominence on Bishopsgate, but it would be larger than consented, with a supplementary arrival space at lower ground floor level. This space would positively contribute to the overall public

offer and would be curated and programmed with a range of food and beverage, artistic or community focused activities to support the ongoing success of the elevated spaces. In addition, there would be a large retail or food and beverage use on the southwest corner, which would provide additional amenity to visitors and workers, supporting the activity and vibrancy of the surrounding area. The revised proposals are considered to be an improvement on the previous consent.

Transport and servicing arrangements

211. The previous proposals would have located the servicing bay on the southeast corner of the building, with vehicle lifts to take servicing vehicles down to lower ground floor level, a blue badge parking space would have been provided in this area. Servicing would have been managed and taken place out of hours to ensure the success of this space.

212. In the revised proposals servicing would take place outside of normal office hours at ground floor level in the same location. The service vehicle lifts have been removed due to the retention of the existing buildings structure, this structure would have left insufficient space for vehicles to turn below ground. Similar to the previous proposals, a blue badge space would remain, and an outdoor market would take place in the shelter of the cantilever.

Proposed Design

213. The proposal would bring a quiet architectural charisma to the City Cluster, with the reuse of existing structural components being at the heart of the design; it would rely not on eye-catching architectural devices for its identity, but the judicious handling of volume (informed by structural retention) dressed in a modern architectural language that would have a simplicity which would contrast effectively with other towers in the Cluster. It would be an elegant and architecturally refined building, adding a rich mix of uses to support and enhance the local area and delivering over 70,000 square metres of office floorspace. It would have excellent sustainability credentials, and be attractive and contextual at numerous scales, with an appropriate character for this part of the City.

214. The proposal would create new high-quality public realm both at ground level and on the upper floors of the building, adding to the City's activity and vibrancy, generating footfall on evenings and weekends in the local area driven by the provision of a high quality publicly accessible spaces, a viewing gallery, and a pedestrian route through the building which would form a seamless link with Leadenhall Market.

215. The proposals are considered to be well-designed, and make an effective use of limited land resource and are considered to be in conformity with City of

London Local Plan (2015) policies CS7, CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.4, CS13, CS14, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, DE5, DE8, S9, S11, HE1, HE3, S12, S13,and London Plan (2021) policies D3, D4, D5, D8, D9, HC1, HC2, HC3, and HC4 regarding architecture, urban design and heritage.

Bulk, Scale and Massing

216. The proposal would retain a large portion of the existing building's structure and re-use its existing materials where possible, whilst introducing a new tower to the Cluster rising to a total height of 149.67m AOD. The proposal's design, with distinctive and different treatments of its podium, tower and crown, respond positively to its immediate and strategic contexts, the overall composition of these elements would create an aesthetically unified whole.

217. The reuse of the existing standing structural components and facade materials would create a base of the building which engages appropriately with its street level context, the structural re-use has dictated some of the parameters of the design for the lower floors, namely the floor to ceiling heights and the width of window bays. The podium element responds to its immediate local context by reflecting a similar scale and proportions to its neighbours, utilising a traditional order with a simple clean architectural language. The elevations on the corner of Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment, with the proposed pedestrian route at ground floor level facing directly on to this key pedestrian route, inviting people through the site into Leadenhall Market. Both the podium and tower elements would address this corner and junction effectively.

218. The podium is divided into three parts, the southern facade fronting Fenchurch Steet would be broken up with strong vertical emphasis, the podium would step down in height from seven storeys on Gracechurch Street to five storeys on Lime Street, these steps would align with the tripartite elements of the tower above, this again assists an overall coherence between the base and the tower above. The base would respect the established height of the immediate context and the buildings along Gracechurch Street and the smaller scale buildings in the adjacent Leadenhall Conservation Area. The 'lightweight' tower resting above would have a clear visual break between the base and tower, which would alleviate its street level presence.

219. The massing of the tower has been sculpted to minimise its skyline presence, it would be broken down vertically with 3 forms which appear as interconnected elements, the geometry of these forms would create a visually interesting tower, convincingly breaking down the bulk of the building. In addition, tapering the overall shape adds to this massing approach, the building would taper outwards up to around halfway up the tower, and taper inwards from the midpoint up to the top of the building, creating a slender form which reads well

in local ground level views and in longer range strategic views. The 3 vertical forms of the tower take their cues from the podium, corresponding to each point where the podium facade steps down from Gracechurch Street to Lime Street. The massing on the southeast and north east corners is expressed as a double curve, adding visual interest at street level, with the remaining edges being curved. This visually softens the building and distinguishes it from neighbouring towers.

220. The 3 vertical volumes of the tower would be stepped up towards the east, starting at 143m AOD on the western end of the building and to 149m AOD to the eastern end. This stepping is more uniform than the previous scheme, which proposed larger jumps between each volume. The towers form is reinforced by its staggered plan, which creates subtle protrusions on the elevations, this breaks down the bulk of the tower and forms an overall a pleasing sculptural composition.

221. The stepped arrangement of the roofscape creates space for a high-quality landscaped public terrace, with a large, internal cultural space and viewing gallery forming a symbiotic relationship with the external roof terrace. The external terrace would have a range of seating and greening, it would have a pergola overhead which is architecturally well detailed and integrated into the design, which would provide shade and shelter to users, bolstering the potential use and flexibility of the space. The terrace and viewing gallery will provide excellent views across the City, particularly those towards the southwest, which could be programmed with a range of cultural uses and events, curated and agreed through the Cultural Implementation and Management Plans, secured by the s106 agreement. This elevated public space is considered to be a significant improvement on the consented scheme, which secured a smaller internal space only.

222. At roof level the proposal would introduce a note of architectural dynamism which would contrast pleasingly with the soberer elevations below. The proposed crown would be dramatically serrated, creating triangular volumes and sharper edges to visually ‘set-off’ the cleaner, quieter curves and tapers of the tower elevations below; the proposed crown would give the proposal an individualism on the skyline without undermining the quiet architectural charisma which characterizes the scheme as a whole. Landscaping would soften the top of the tower in a broad selection of views, emphasizing the presence of the public terrace whilst making a positive contribution to the overall aesthetic composition of the Cluster, these terraces would introduce both climbing plants alongside floor-level planting contributing to urban greening and biodiversity.

Materiality

Podium:

223. The existing building's structural frame would be retained, dictating the floor to ceiling heights and width of window bays. This has informed the rhythm of the new facade, especially at street level where the columns are free-standing, this also helps establishes the basic window dimensions and spacings to the floors above.

224. The podium is intended to have a distinct identity from the tower. The base would follow a lighter, mostly neutral colour palette, referencing adjacent buildings and the wider neighbourhood where older buildings are generally finished in Portland stone, Warmer stone would frame the lighter re-used Jura limestone. These materials will be used alongside darker window framing that would be coherent with the tower above. The podium of the building relates closely to its surroundings in terms of scale, relationship to the street and materiality. This provides a more human scale while also providing a strong grounding for the tower above.

225. The ground and mezzanine floor levels that contain the retail, public offer and office entrance would be pulled back from the pavement line on the south elevation to create a colonnade. The corner at Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment to mark its townscape prominence.

226. The principal podium façade framing is proposed to be clad in a buff-coloured stone material with pinstripe recesses at the nose of every expressed vertical, in this are the re-use of existing cladding would be maximised, with the details and the material re-use to be agreed through condition. The plain spandrel panels beneath the windows are proposed to be in a similar colour to the verticals, which would be slightly recessed to create a vertical emphasis. The parapet would be a simple design with the horizontal panels tapering outwards. The flat side panels to the windows will incorporate vertical caps to the outer edges to add greater depth and refinement to the façade.

227. A large portion of the north façade within Ship Tavern Passage would be panelled above the glazed ground floors. The concrete clad façade retains the grid pattern as the rest of the facades but the panels would have a ribbed concrete finish to add texture and a level of detail, to provide a level of visual interest and animation on the building facade for those approaching the passageway from the alleyways to the north and Leadenhall Market. These materials would be agreed by condition to ensure their high quality and appropriateness to context.

228. There would be landscaped terraces on the roof of the podium, which wrap around the perimeter of the plan, providing a private outdoor amenity for office workers, a key component of providing best in class office floorspace. This will provide the podium with a termination that comprises a set-back glass balustrade with planting behind. This will positively contribute to urban greening and help soften and clearly define the transitional lower portions of the tower that are defined by a zone of plain clear vertical glazing.

Tower:

229. The tripartite form of the tower would be reinforced by the treatment of the facade, which introduces a strong horizontal emphasis to the floor levels through the use of dark, visually recessive window framing between light, metallic spandrel bands, the proposed materials and the overall shape of the building would work well together. The silver metallic spandrel panels with moulded horizontal nosing provide some visual animation with contrasting light and shadow. The three tower volumes are separated by strong, vertical recesses that will be reinforced by a vertical fin that terminates the horizontal banding, creating great shadow and depth and further breaking down the mass.

230. The curved faceted corners at the eastern and western ends vary in radius due to the tapering, this would again soften the buildings' form on the skyline. This will also ensure that continuous and unbroken banding of glass and moulded spandrel panels is achieved, again working well with the overall massing concept.

231. The north portion of the tower incorporates plant and machine rooms that will require ventilation. For this reason, zones have been identified on the façade for louvered vents which run vertically down the facades in two long stripes with larger rectangular areas of vents to the top third and fourth floors. The final design of these louvered panels would be secured by condition to ensure a high-quality finish.

232. The transitional zone between the podium and the tower would be glassier, revealing structural interface between these elements as well as creating a visual recess to separate them.

233. The upper office terrace zone occurs at the upper shoulder level, creating five separate terraces where the massing of the building crown is set back. These are also landscaped and offer a variety of usable spaces, protected by tall glass balustrades.

234. The uppermost storey of the building works with the stepped massing, accommodating plant equipment and the BMU housing, successfully screening this layer of functional equipment from view, enclosing these utilitarian features within the overall tower envelope.

235. The detailed design and architecture of the proposed development is of an excellent standard. Both the tower and podium would make a positive contribution to the local area and the emerging City Cluster of tall buildings. The proposed high-quality materials and detailed design provide a richness to the building, appropriate to the character of the City as well as the setting of surrounding buildings and spaces. The elevations would have a depth and quality of modelling, of a high standard of design and architectural detail.

Public Realm

236. Capitalizing on the site's central location, the proposed development offers diverse opportunities for public interaction and engagement through a mix of elevated public spaces, ground-level public realm enhancements, and a significant cultural and retail offering. This dynamic combination appeals to a broad demographic, fostering an inclusive, welcoming, and highly functional environment for both visitors and workers. The carefully designed sequence of public spaces emphasizes safety, accessibility, and user experience, ensuring it caters effectively to the needs of all users.

237. The existing seven-story building at 70 Gracechurch Street occupies the full site footprint, with no public route to Leadenhall Market. The existing public realm lacks active frontages on Fenchurch Street and Lime Street which are characterised by blank facades, loading bays and servicing entrances.

238. The proposal would significantly improve the existing public realm around the site and would significantly increase the amount of public realm and spaces on the site, in the form of a new north-south pedestrian route, a pop-up space to the east of the site, a split-level cultural space at ground and lower-ground floor levels, and a new elevated internal and external public space at level 32. The proposal elevated public space totals 836 sqm, combining 489 sqm of indoor space with a 347 sqm terrace.

239. The proposals represent compliance with Policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.2 DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm proposals are considered by officers to be a benefit of the scheme, weighing in its favour. The proposals would represent a substantial public realm offer to the City.

Ground Floor Public Realm and North South Pedestrian Route

240. A new north south pedestrian route is proposed directly through the site from Fenchurch Street to Ship Tavern Passage. The new route has shifted from a perpendicular alignment which ran parallel to Gracechurch Street in the previous permission (20/00816/FULEIA**)** to a diagonal alignment which reconnects the less visible areas of Leadenhall Market to Fenchurch Street, establishing connections between Gracechurch Street and 'The Swan Tavern'. This is a key benefit of the scheme, improving north-south routes in the City Cluster and linkages to Leadenhall Market and its retail uses and relieving footfall from the existing street network. The proposed ground floor will transform the existing closed perimeter block into an active and permeable route with cultural entrances, a digital screen, and gathering spaces.

241. The proposals significantly enhance the existing public realm, creating a concentration of active frontages and a legible and inviting route that seamlessly integrates with the City's rich tapestry of historic alleys, leading into Leadenhall Market and the Conservation Area.

242. The podium is well-defined, with a harmonious balance of solid and void elements in the street-facing elevations, supported by robust columns that emphasize the building's tripartite structure and give the ground floor a sense of dimension and depth. The facades are thoughtfully designed to complement the townscape, achieving a balance of traditional order and scale with a simple, clean architectural language. The selected material palette of buff and light stone cladding and grey precast concrete, complemented by mid grey panels contributing to a cohesive and visually appealing streetscape.

243. The office lobby features glazed and curved facades with a high proportion of glazing facing Fenchurch Street, enhancing visual connectivity, and adding architectural interest.

244. The north-south connecting route through the buildings is designed with expansive glazing and double-height proportions creating a suitable extension to Ships Tavern Passage. The scale, height and dark grey metal details have a vertical emphasis which help make the space feel more open, brings natural light into the space, enhances visibility, and improves the legibility of access routes, creating a more inviting environment.

245. The inclusion of a digital art wall helps to enliven and activate the new route, dedicated to displaying art and cultural content linked to the gallery, reinforcing the building's cultural offerings.

246. The arrival sequence to the proposed public spaces is well considered. Clearly marked entrances on Gracechurch Street and the north/south route guide visitors to lifts and a grand staircase to the basement. From there, lifts or stairs

provide access to the Level 32 cultural space and outdoor amenity which has the capacity to accommodate 333 members of the public based on fire capacity. The lifts would take people from basement level to the top of the building in less than one minute. The lifting strategy and its management will be secured via S.106 to ensure inclusive access.

247. The proposals address site-level changes with a step-free, inclusive design allowing unrestricted access, secured via legal agreement. Well-detailed ground and first-floor elevations ensure active frontage, with security features integrated into the facades to maintain safety without visual clutter.

248. The active uses lining the ground floor will animate and enliven the public realm, marking a significant improvement over the impermeable and closed nature of the existing building which lacked activate frontage on Fenchurch Street and Lime Street. The proposed ground floor would be attractive, permeable, legible and provide good levels of passive surveillance. The mixed-use nature of the development, will stimulate activity throughout the day and week, appealing to a broad and diverse audience in compliance with policies S8(6) / D3(D;3/6/10) & D8 (F/G) / DM 10.1.

249. Planters are proposed, integrated into the western façade of the building at ground floor level, planters edged with Corten steel and filled with perennial shade tolerant planting, softening, and enhancing the street frontage.

250. The public realm will feature a palette of York Stone and durable flush granite cobblestones for the north-south connection and southeastern market area. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Public Realm Toolkit, with final detail reserved for condition. The proposals would also rationalise and minimise street clutter.

251. The specification of hard landscaping, which must be resilient, easy to clean, of high quality, and inclusive, with full details of tactile paving and the demarcation of the blue badge bay, will also be secured via condition.

252. The materiality of the public realm, proposed planting and all associated furniture is considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

Eastern Pop-Up Space

253. The eastern part of the ground floor is multifunctional. The space is entirely open to Fenchurch Street and Lime Street at ground floor to the east which accommodates a large piece of public realm in the daytime, suitable for retail

pop up uses to provide further dynamic enhancement and activation to this part of the City.

254. The southeast corner of the site would be open-sided, providing a significant area of outdoor publicly accessible space in daytime hours. This space is proposed to be cleared when the area is needed for service use between 10pm and 6am. Management of the pop-up market would be secured in the S106 Agreement through the Public Realm and Market Management Plan. A single accessible blue badge parking bay is included and will remain accessible at all times. A Public Realm and Market Management Plan, secured through a Section 106 agreement, would ensure the space aligns with London Plan Policy D8 and the Public London Charter, detailing strategies for safety, accessibility, inclusivity, public access, events, and maintenance to keep the space functional and welcoming to all. This will allow pop-up retail and cultural uses in this area, enhancing the variety of activity on Lime Street.

Elevated Public Space

255. Visitors access the elevated public space would be through the B1 level which includes a community space via stairs or lift, before travelling to the flexible cultural space and outdoor amenity on level 32 via lifts. The indoor amenity on level 32 leads to a landscaped outdoor terrace with seating, a pergola, and a mix of hard and soft landscaping. Local Plan policy DM10.3 and emerging City Plan policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible roof gardens and terraces with high levels of urban greening, which the proposals would comply with.

256. The rooftop terraces (levels 32-33) feature pergola structures with vines as the primary greening element. Made from low-maintenance aluminium and steel, the pergolas have a lattice roof and perforated columns for vertical plants and integrated seating. The texture palette includes metal, creeping vines, jasmine, and grapevines, with recycled steel planter edging and fibre concrete benches.

257. The terrace has been carefully designed to create an optimal climate for dwelling, 3m glass balustrades from the parapet and vertical greening from the pergola would create a safe environment comfortable for dwelling. The glass balustrade adds wind protection and security designed to optimize thermal comfort and meet policy requirements for suicide prevention. In terms of current legislation, Building Regulation K2 states the following: K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and (B) any lightwell, basement area or similar sunken area connected to a building, Shall be provided with barriers where it is necessary to protect people in or about a building from falling.

258. The space is adequately designed for year-round use with a robust and durable material palette, added greenery and dedicated public entrances for safety and

operational efficiency. Additionally, the design and placement of terrace entrance doors will be conditioned to ensure accessibility year-round, taking into account wind conditions.

259. The proposed material palette for the primary amenity terrace includes Yorkstone, covering an area of 213.15m², and recycled pavers, covering 666.98m² (pending results of the demolition audit). Overall, the planting and material selections are deemed to be of high quality are considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.2 DM10.4, London Plan (2021) Policies D3, D4 and D8.

260. Full details of the landscape designs, including planting specification, and strategies for furniture, pergola design, lighting and hard surfaces, will be conditioned to ensure the designs are of a high quality and resilient in this context.

Public Realm, Management, Cultural and Programmable Events

261. The cultural offerings are thoughtfully distributed throughout the building, providing visitors with a diverse and dynamic range of activities. The gallery and sky gardens on Level 32 will feature art exhibitions and community events, offering views of London's historic core. At ground level, a public entrance gallery, a versatile covered market space, and a internal digital screen will create a lively and welcoming environment. The lower ground level will house a flexible subterranean space, dedicated to celebrating local history and showcasing the work of emerging artists, fostering deeper community engagement. The cultural offer aligns with Local Plan policy CS11 to enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences.

262. The culture plan aligns with London Plan Policy D8 and the draft Public London Charter, maximizing public access while minimizing restrictive rules. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

263. The combination of the enclosed public viewing gallery and roof terraces would result in an elevated public space of the highest quality, providing a valuable space for culture as well as expansive views over London for all to enjoy. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate culture in the form of sculpture, art, pop up cultural performance and educational events.

264. The public viewing gallery would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New

Year's Day if required) and during the hours of 10am to 7pm or nautical dusk, whichever is the later, and there is no need for a booking system for users and would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.

265. The proposal would far surpass the consented scheme by increasing public space to 1,251 sqm, blending indoor and outdoor areas, and enhancing cultural programming, offering greater flexibility, improved engagement, and a generous amount of civic space. The provision of new public space in the Cluster is crucial as it continues to consolidate, and the proposal would make a significant contribution to this.

Urban Greening Factor

266. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO2 while releasing O2, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.33 which exceeds the draft London Plan policy G5(B) UGF target of 0.3.

267. A substantial increase in greening is integrated into the architectural approach on the building, delivering new planters facing Gracechurch street at ground, integrated planters and benches at podium level 5-7 and upper balconies 28-31 and vertical greening on the pergola, planters, and intensive living green roofs in the sky gardens at levels 32 and 33.

268. The total site area is 3,376.7 m², comprising 2,933.51 m² of base area and overlapping pergola surfaces of 154.26 m² (L32) and 288.92 m² (L33). Pergolas, integrated into the "Green wall" system, feature native and resilient vines with elevated planters for long-term sustainability. Vegetation coverage is 78% (120.21 m²) for L32 and 88% (253.39 m²) for L33, contributing to the green wall factor while being fully included in the total site area.

269. The proposed planting pallet references the 'market produce' of historic Leadenhall market and features harvestable plants including fruit trees and vines. The planting pallet would ensure trans-seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits. The details would be secured by condition and would include maintenance and irrigation details.

270. DM10.2 of the Local Plan and S8(7) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of the city by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2

Lighting

271. At ground level a media wall on the eastern flank of the passageway is envisaged as displaying a history of the site, while projected lighting onto the vaulted passageway soffit enhances visual signalling towards Leadenhall Market. A lighting strategy will be secured through condition covering the detailed design of the digital screen, its management and any necessary restrictions. It would not be allowed to show advertisements.

272. At the roof terrace on level 32 it is indicated that lighting could be incorporated into the structure of the pergola.

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

Transport Related Urban Design Considerations

274. Hostile Vehicle Mitigation (HVM) is integrated into the building's facade where possible with an additional line of bollards surrounding the public market space facing Lime Street, and at the ends of the pedestrian through route. The HVM will not be placed on public highway and a requirement to provide further details of this for approval would be secured by condition.

275. People would be able to walk north/south through the building from Fenchurch Street, providing relief to the footways surrounding the development and offering a new route; the new pedestrian through route would be open to the public 24 hours per day with step free access.

276. There may be stalls or public furniture placed in the servicing area in the under croft of the building to the southeast of the site when it is not in use for servicing, to allow people to dwell between the development’s opening hours between 6am and 10pm. The blue badge parking space will be available during the

development's operating hours and will convert to a loading bay from 10pm to 6am for deliveries and servicing, enabling dual use of the space.

277. Further public realm enhancements are proposed to the public highway to ensure planning acceptability, including widening footways and resurfacing public highways to enhance walking and cycling on Gracechurch and Fenchurch Streets. Additional works include signalizing the Lime Street/Fenchurch Street/Philpot Lane junction, subject to a feasibility study. Temporary measures introduced during Covid-19, such as bollards and surfacing, are to be made permanent, with TfL seeking s106/s278 contributions from this development. Highway improvements must align with Healthy Streets principles, with works secured through Section 278 Agreements, fully funded by the applicant. The City of London is the Highway Authority for Fenchurch Street, while TfL oversees Gracechurch Street, requiring Section 278 Agreements for design and delivery of improvements within their jurisdictions.

Delivering Good Design and Design Scrutiny

278. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

279. In respect of D4B, the pre-application process including formal meetings, workshops using visual tools and site visits and as applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

280. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development officers. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping, with the use of 3D tools to scrutinise the proposals. Wider engagement by the applicant is set out elsewhere in the report, and has included consultation with wider stakeholders on the height and massing of the proposals and heritage impacts.

281. Part D4 C has been met and a detailed design and access statement has been submitted.

282. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local “borough” process of design scrutiny as required by the policy. In addition, the applicants undertook pre-application engagement with external stakeholders including St Paul’s Cathedral and Historic England.

283. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

284. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on submitted drawings to minimise ambiguity. The recommendation is also supported by a condition to ensure the detailed design would include materials of the highest standard.

285. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design and officers consider that the relevant parts of the policy have been complied with.

Conclusion on Architecture, Public Realm and Urban Design

286. The proposal would have a quiet architectural charisma that stems in part from its extensive reuse of existing structural components and materials; compared with other towers in the Cluster and the previous proposal on the site it would have a simpler, calmer form, helping to diversify the architectural character of the evolving Cluster and providing a moment of quiet architectural gravitas. Nevertheless, with its raffish, serrated crown, it would also contribute to that architectural dynamism which is at the heart of the Cluster’s character.

287. Officers consider that the proposal would result in a unique piece of architecture which would make a strong contribution to the identity of the City, with a visually permeable ground floor frontage, and increase in ground level public realm through the inclusion of the proposed cultural and publicly accessible uses, and a new route through the development to Leadenhall Market which would become an integral part of the arrival experience to the roof garden. Officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which expands ground level public realm. The proposals would enhance the overall quality and character of this section of Gracechurch Street.

288. The proposed development will significantly enhance the public realm, offering a greater variety of vibrant, inclusive, and accessible spaces that surpass the scale of the previously approved scheme. Key improvements include to the existing site include a highly permeable pedestrian route, improving access to Leadenhall market, improved active frontages through cultural and retail uses and the introduction of new civic spaces including a large viewing gallery, a rooftop terrace gardens and a pop-up market. The combination of an increased

civic offering, improved connectivity, and additional green space will provide a more functional inclusive and attractive public realm that would benefit the city's growth.

289. The architecture and urban design proposals comply with Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.

290. It is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate employment growth and would increase the amount of high-quality office space. The proposals would balance this need with the ambitions of Destination City, and would help to create an active and vibrant City core through providing a rich tapestry of uses and activities. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.

Strategic Views and Heritage

291. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13, emerging City Plan 2040 policies S12 and S13, and the City's Protected Views SPD, all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG, which provides guidance on the protection and enhancement of views of historic City Landmarks and Skyline Features, including securing an appropriate setting and backdrop to the Tower of London (WHS).

292. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. A THVIA Addendum dated December 2024 was submitted to provide additional information. In addition, an Environmental Assessment (ES) Addendum was provided in December 2024 to amend the views for the developments' future cumulative scenario.

293. The views selection was informed by extensive testing. The split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development. Officers consider the selection of views and the type of imagery provided is extensive and thoroughly visualises the visual impacts of the development. For some views, wireline images were considered to provide an acceptable level of detail given the amount of detail shown in rendered images in similar views.

294. For clarity, the previously consented tower scheme at 55 Gracechurch Street (ref: 20/00671/FULEIA), to the south of the site, has been removed from the cumulative views imagery as this scheme has not been implemented, and its planning permission has expired. Similarly, Fountain House, 130 Fenchurch Street (ref: 16/00809/FULMAJ & 19/00713/FULMAJ), located to the east of the site, has expired and has been removed from the cumulative scenario. 99 Bishopsgate (ref: 24/00836/FULEIA), validated on the 9th of September 2024 and has been added to the cumulative scenario. 99 Bishopsgate is located approximately 150m to the northwest of the site.

295. Consultee responses have been received from Historic England, St Paul's Cathedral, and London Borough of Tower Hamlets, which relate to the impacts of the proposed tower on strategic views, St Paul's and the outstanding universal value of the Tower of London World heritage site, and best practice in terms of impact assessment in accordance with policy guidance for Impact Assessments in a World Heritage Context (2022).These are referenced and discussed in detail below.

Tower of London World Heritage Site

OUV and Relationship to Setting:

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

297. Whilst the Tower of London comprises a scheduled ancient monument, and various listed buildings and is in a conservation area, it is considered proportionate and robust, in the circumstances of this case, to consider the impact on OUV in order to draw a conclusion on these assets as a whole.

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

299. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre of the City of London (at

paragraph 2.4.25) and that the relationship between the ToL and the Cluster is long-established, forming a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at paragraph 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider i.) their effect on the established Cluster ii.) the space between it and the ToL and iii.) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

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

301. Consultee responses have been received from Historic England and London Borough Tower Hamlets. Historic England provided advice but have not objected to the proposals, identifying harm 'modest' harm to the WHS and ToL, although this consultation response acknowledges that the design of the proposed scheme when compared to the consented is calmer, it is welcomed by Historic England as a change in design. In the conclusion of the consultation response, Historic England suggest that the proposal 'would cause some harm' to the Tower of London WHS.

302. In addition, London Borough Tower Hamlets (LBTH) have provided observations and state that the proposals would exacerbate the existing harm to the setting of the ToL caused by the City Cluster, Tower Hamlets have commented that the visual impacts on the WHS would be negligible-minor neutral, in accordance with the Mayor of London World Heritage Sites Guidance on Setting. Neither of these consultees have formally objected to the proposals.

303. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England and the LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 7, 8, 9, 10A, 10B, 10C, 10D, 12, 13, 14 and 15 of the THVIA. Tower Hamlets have also raised whether views 9, 10b and 13 of the THVIA should be rendered views, however, officers regard the information set out in the THVIA and the ES to be sufficient to assess the impact on the WHS and in relation to townscape, visual and heritage impacts.

304. The proposal would be visible within, and would therefore result in a change to the wider setting of the WHS. However, change is not necessarily harmful. Views, including those identified within the LVMF view management framework, and ToL Local setting study, where the proposal will be experienced in conjunction with WHS, are identified and assessed below.

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

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

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

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

308. In this view, the proposal would appear to the west of the ToL, with a thin portion of the proposed building visible to the north of 20 Fenchurch Street, on the western periphery of the Cluster. 70 Gracechurch Street would appear a considerable distance away from the ToL. The east elevation of the proposal would be visible, viewers would see the simple and elegant horizontal spandrel panels articulating the predominantly glazed facade, set back from 20 Fenchurch Street, these facades would add richness and depth to the composition of the City Cluster.

309. Officers consider that the characteristics and composition of this viewing experience would not significantly change as a result of the proposals, given the intervening distance between the proposal and the ToL, the existing presence of 20 Fenchurch Street within this view and the way it would almost wholly occlude the proposal. In this location, the proposals form, scale and massing would complement and consolidate the Cluster as a distinct skyline.

310. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not compromise those relevant attributes of OUV. It would leave unaffected those relevant components which also form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship to the River Thames and City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paragraphs 183-186).

311. Furthermore, the minimal yet additional mass to the north of 20 Fenchurch Street, in conjunction with 1 Leadenhall, would contribute to the consolidation of the Cluster into a more coherent, clear and discreet form. It would appear visually separated with the preeminent tower in the foreground setting of the river, the proposals would reinforce and make more legible the juxtaposed relationship between two related skyline identities, the historic ToL and the modern City Cluster, which is an important aspect of the understanding and appreciation of its OUV. The tower, and its concentric defences, would still read as a powerful defensive structure strategically sited to preside over the river, distinct from the City Cluster Skyline and its surrounds.

312. Equally, from this vantage point, the proposed building would preserve the observer's ability to recognise and appreciate the relevant Strategically Important Landmarks, the ToL and St Paul's Cathedral and would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

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

313. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

314. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, only slivers of which would appear behind 20 Fenchurch Street on the western periphery of the Cluster, it is not considered that the proposal would undermine the composition and characteristics of the view or those landmark elements. The southwest corner of the proposed tower would appear as a sliver behind 20 Fenchurch Street, where its well-designed, sleek and elegant facades would appear. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City.

315. The siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 57, 418-422) and guidance contained in the Local Setting Study.

LVMF View 11B.1-2, River Prospect, London Bridge (Downstream)

316. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.

317. Given the pre-eminence of the River Thames in the foreground and the significant intervening distance between the Tower of London and the proposal, which would be on the western periphery of the cluster, only just within the LVMF viewing frame to the west, it would not undermine the composition and characteristics of the view or those landmark elements. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.

318. The proposal would be located distantly from and so not affect the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, ‘dominance’ and silhouette of the White Tower.

Inner Ward, Tower Green and the Scaffold Site

319. The LSS states there is a range of views from within the Inner Ward and the identified Representative View 1 is the Scaffold Site. These views are deemed by the Local Setting Study to illustrate the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated 'Objectives and Guidance' development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.

320. These viewing experiences have been assessed in a three-dimensional model and have been shown in views 10B, 10C and 10D of the THVIA. The proposal would have no negative visual impact. From views nearer the White Tower looking towards the Chapel of St Peter ad Vincula, the proposal would be seen rising behind 20 Fenchurch Street, in the distant backdrop of the Chapel Royal of St Peter ad Vincula. It would be a considerably lower height than 20 Fenchurch Street, and set behind it, the majority of the proposed building would be masked with 20 Fenchurch Street sat closer to the observer. Only in very minor fleeting glimpses would a part of the eastern elevation appear behind the Chapel. Moving toward the Chapel, in its immediate setting from the green, the proposal, followed by the rest of the Cluster, would move out of view, the Chapel and the ToL would remain unchallenged by the proposals and pre-eminent in the view of the observer.

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

Inner Curtain Wall (South)

322. Local Setting Study view 4 recognises that this view is a 360 degree experience, the aim of which is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River. The associated guidance seeks to maintain the White Tower as the key focus to the

north, appearing more dominant than buildings in the Inner Ward or those beyond.

323. A sliver of the proposal may appear to the north of 20 Fenchurch Street, which is positioned to the west of the White Tower, it would however be largely obscured by the existing trees within the ToL. Where visible, if at all, it would assist in consolidating the Cluster's distinct urban form and separate long-established identity. The White Tower, accentuated by its fortified massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation of it as a historic gateway would be undiluted. It is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study would be complied with.

Inner Curtain Wall (North)

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

325. The proposal, sited a considerable distance to the west of these views, would appear next to 20 Fenchurch Street where the upper third of the proposed tower would be visible, it would add to the southern edge of the established Cluster, making a small stride to consolidate its distinct form and overall shape, whilst preserving the Eastern Clusters relationship with the Tower of London. The concentric defenses would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance.

Chapel Royal of St Peter ad Vincula, Tower of London (Grade I)

326. Dating from the early 16th century, the grade I listed stone chapel in the grounds of the Tower of London is of very high architectural and historic significance and forms part of the World Heritage Site. The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The tall buildings are part of the setting of the Chapel.

327. The proposed development would appear in the small sky gap between 20 Fenchurch Street and the Chapel bell tower, while its height is at the same level as the solid base of the bell tower and would not extend to the distinctive lantern.

328. The change to this view is considered to be minor due to the marginal visibility of the proposed development. The distance away and high quality architecture of the visible part would avoid any harm to the setting and its contribution to the significance of the listed building. The lantern bell-cote of the Chapel would be unaffected and remain seen against the sky backdrop. As such the proposal would not result in harm to the setting of the Chapel Royal of St Peter ad Vincula. The contribution the setting makes to the significance of the listed Chapel within the inner ward of the Tower of London would not be adversely affected.

329. The cumulative effect of the proposed development is a very small addition in relation to the other cumulative tall buildings in the Cluster. Its marginal visibility behind the bell tower makes a minor and balanced contribution to the cumulative effect and is not considered harmful to the setting of the Chapel or its contribution to the setting and significance of the other listed buildings within the Tower of London World Heritage Site.

Other Views

330. Other views have been assessed which demonstrate the relationship between the proposals and the ToL. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which, towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster and the ToL ensemble, which would dominate in the immediate foreground, causing no harm. There are other views which demonstrate the relationship between the ToL and the siting of the proposed tower, where the proposal may be visible, but this would occur in areas which would not undermine attributes of OUV or harm the ToL.

Conclusion – Impact on Tower of London World Heritage Site:

331. The proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3), emerging City Plan Policies S11 and SE13 (3), HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.

332. Historic England and LB Tower Hamlets have provided advice regarding the way they perceive the proposal would add to the bulk of the Cluster, which they say could cause harm to the WHS, although neither stakeholder have formally objected to the proposals. Officers disagree with the conclusions regarding heritage harm, whilst attaching great weight to the views of these stakeholders; put simply, the proposal's location on the far side of the Cluster, and largely concealed behind 20 Fenchurch Street, would make it an extremely recessive presence in views of and from the WHS, with the intervening main form of the Cluster far more obvious. The proposal would appear on the extreme periphery of the viewer's eyeline when observing the WHS, or would simply not be noticed by them. The proposal would amount to comparatively modest consolidation, in most views it would only be partially visible as a small expansion of the Cluster's overall existing form, it would not fundamentally alter the Cluster's visual relationship with the WHS.

333. As such, it is considered in all instances that the overall impact would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG, the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble. It is the view of officers that the proposed development would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, the Scheduled Monument or the conservation area of which it is part.

London View Management Framework (LVMF) Impacts

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

335. The site is located on the south-western periphery of the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57, 87, 129, 130, 144, 146, 187).

336. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several assessment points, these are discussed below.

London Panoramas and Townscape Views

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

338. Being located within the City Cluster (which is strategically sited as such), the site is located outside all of the geometrically defined viewing corridors in the LVMF London Panoramas and Linear and Townscape Views. It would however be visible from several of these Assessment Points as part of the City Cluster. In particular it would be seen from the North London hills at London Panoramas at LVMF 4A.1 (Primrose Hill: the summit), LVMF 2A.1 (Parliament Hill: the summit), LVMF 3A.1 (Kenwood: the viewing gazebo), LVMF 1A.1 (Alexandra Palace: the viewing terrace). From these places, the scheme would appear as a proportionate, high-quality and well-integrated new addition to the overall Cluster composition and would reinforce its skyline composition. It would result in a minor enhancement to these views overall.

339. From LVMF 6A.1 (Blackheath Point) and LVMF 5A.2 (Greenwich Park: the General Wolfe statue), the proposal would be nearly or entirely screened by the existing form of 20 Fenchurch Street and the impact on these viewing experiences would be negligible.

340. In all such long-range views, the proposal's magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving the composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not be visible and would not have an impact.

341. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS 13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2040 Policy S13.

River Prospects

342. In these viewing experiences, the magnitude of change and potential impact would be greater, given the building would be located on the south-western edge of the City Cluster, in close proximity to the river Thames. River Prospect views 10A.1 and 25A.1 have been assessed above, the remaining relevant views are identified and assessed below.

LVMF View 15 (15B.1 and 15B.2), River Prospect, Waterloo Bridge (downstream) THVIA View 42 & 43

343. This is an iconic London view. St Paul's Cathedral is identified as the Strategically Important Landmark. It is considered that the proposal would complement the development of the emerging City Cluster as a coherent entity in the skyline composition, assisting in subduing and taking the tension out of the isolated 'eye-catching' visual influence of 20 Fenchurch Street. The height is appropriate to the site and would create a gentle undulation in the roofline of the Cluster, stepping down from the apex around 22 Bishopsgate, towards the scale of the River and would be of a high-quality design. This is in accordance with paragraph 263 of the SPG visual management guidance. With its quiet architectural charisma and comparatively modest height, the proposal would appear embedded in the Cluster and clearly disassociated from the Cathedral.

344. The proposal's west and south elevations would be most prominent in these views and the understated horizontal articulation of the white spandrel panels would add a calm elegance to the Cluster. The west elevation would be obliquely visible, with the curved southwest softening the corner of the proposed building. The south elevation would be partially visible, its breadth broken up and articulated by the vertical 'seams' which align with the dynamic serration of the crown. In the future cumulative scenario, this southern elevation would be partially blocked by the form of 60 Gracechurch Street.

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

346. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 262-264, 265 and 57 of the SPG.

LVMF View 16 (16B.1 and 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform. THVIA View 41.

347. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street to the far east and south of this view into the cluster. Due to the angle of the view, the proposal's refined form and massing envelope would be more legible here, adding an interesting silhouette to its part of the skyline.

348. Despite its prominent location towards the southern edge of the Cluster of the cluster, the proposed tower's location, height and massing, is considered to embed successfully within the composition of the Cluster, and preserve and

enhance the townscape setting of St Paul's whilst not detracting from wider landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

349. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-281, 283 and 57 of the SPG.

LVMF View 17 (17B.1 and 17B.2), River Prospect, Golden Jubilee / Hungerford Footbridges (Downstream) THVIA View A2.

350. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal's appearance in these views would be similar to the visibility from Waterloo Bridge described above. Here, the proposal would consolidate the form of the Cluster, stepping down in height from the apex of the Cluster toward the River. With its quiet architectural charisma and comparatively modest height, the proposal would appear embedded in the Cluster and clearly disassociated from the Cathedral. Accordingly, it would preserve a recognition and appreciation of St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and would not obscure or detract from a landmark feature, according with the visual management guidance in paragraphs 301-305 of the LVMF SPG.

Summary of LVMF Impacts

351. The proposal would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Paul's and ToL), in accordance London Plan Policy HC4, Local Plan Policy CS13 (1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.

352. The proposal would preserve St Paul's Cathedral and the Tower of London as the Strategically Important Landmarks and the composition and characteristics of all LVMF views. Lighting will be detailed by condition and managed to ensure the development would not command the focus within these views or distract unduly from other elements of their composition, but be visually compatible with them after dark.

City of London Strategic Views

353. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development. The proposed development site is located within the eastern half of the City of London, and as such falls outside of the St Paul's Heights policy area.

354. Kinetic views from the Southbank and the river bridges are identified in the SPD. The heritage significance of relevant historic City landmarks is considered below within the section on indirect impacts to heritage assets.

The Monument to the Great Fire

Monument Views

355. In support of Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

Views from the Monument

356. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.

357. Paragraph 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.

358. The building would read as part of the emerging City Cluster, still allowing for an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would not adversely affect the view. In the cumulative scenario, the proposed building would be obscured by the proposed 60 Gracechurch Street development.

359. No other identified view from the Monument would be affected.

Views of and Approaches to the Monument

360. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be located relatively nearby. It would be prominent in views from Tower Bridge (paragraph 4.22 of the SPD) and the Queen's Walk (western end) (paragraph 4.26).

361. From Tower Bridge the proposal would not obscure or dominate the Monument and would read as part of the Cluster, adjacent to 20 Fenchurch Street. As part

of this dynamic, diverse viewing experience, the proposal would cause no harm.

362. Those views from the Queen's Walk (western end) of the Monument, are identified as the most complete and intimate views of the Monument from the South Bank (4.26). The view from directly opposite on the South Bank is approximately on the line of the Old London Bridge and remains one of the oldest and best views of the Monument. At present, the Monument is backdropped by the emerging Cluster with some limited sky-etched silhouette afforded to the crowning flaming urn finial. The proposal would leave this unaffected. The siting, height and form of the proposal would allow it to read as part of the emerging coherent Cluster form, while the clean and simple design would not detract from or visually overwhelm the Monument. It is considered that the proposal would accord with the guidance in the Protected Views SPD.

363. The SPD identified approach to the Monument view from the Gracechurch Street/Lombard Street junction, would be unaffected as the site does not fall within this view.

364. Further assessment of the impact of the proposed development on the significance of Monument is found below within the section on indirect impacts to heritage assets.

Conclusion on Monument views

365. The proposal would preserve all views of and from the Monument identified within the Protected Views SPD and would thereby accord with Local Plan policy CS13 and emerging City Plan S13 and associated guidance in the Protected Views SPD.

St. Paul's Cathedral

St Paul's Viewing Points:

366. The proposal would not be visible and would be out of scope of many of the Viewing Points of St Paul's identified in the Protected Views SPD. Owing to its scale and close proximity to the river, it would be visible along the full kinetic riparian sequences from Waterloo Bridge through to London Bridge and from the Golden Gallery.

367. The Surveyor of the Fabric of St Paul's Cathedral have not objected to the application, but in their consultation response has made reference to two potential impacts, views from the Processional Way and views of the Cluster in LVMF views.

368. The proposed development would lie approximately 1km to the east of the Cathedral, within the centre of the existing City Cluster of tall buildings.

369. The proposed buildings form has been slightly reduced in height, and is form subtly altered from the previous consent. Its overall shape works in a manner which would be the least impactful on strategic heritage assets, including St Paul's.

370. The Surveyor to the Fabric of St Paul's Cathedral stated, "views such as 15B.2 has the potential to cause heritage harm through unacceptably increasing the visual presence of the cluster as a whole, thus challenging the pre-eminence of the Cathedral on the London skyline and the historic and architectural special interest of St Paul's as a Grade I listed building."

371. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges, they would be preserved with the Cathedral remaining as the pre-eminent landmark in the view and this represents an important element of significance, both as a symbol of the Diocese of London and as an internationally famous symbol of London itself with Wren's great classical dome dominating the townscape around.

372. In medium and long-range views from the west along the River Thames, including from LVMF River Prospects, the proposed development would appear on the southwest edge of the City Cluster, well separated from St Paul's Cathedral. It would help to consolidate the cluster's cascading arced form, the proposals would appear in the distance, very detached from St Paul's Cathedral in views from the west (LVMF Views 15 and 16). The proposed development would not interact or compete with the silhouette of the Cathedral. It would appear firmly embedded within the Cluster and visually disassociated from the Cathedral. The proposals are not considered to challenge the pre-eminence of the Cathedral or detract from the historic and architectural special interest of St Paul's.

373. Furthermore, the Surveyor to the Fabric of St Paul's Cathedral stated, "the Chapter, would be strongly opposed to any development proposals that impinges on kinetic views of the Processional Way, which - if there were any visibility – would have the potential to cause a high level of visual impact and subsequent heritage harm to this Grade I listed building of exceptional significance. We therefore welcome the assurances within the application pack that the proposals now brought forward will not be visible in these views".

374. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill (Fleet Street Sequence Views 32A. 32B, 32C, 32D and 32E). The envelope of the building has been designed to avoid any erosion of sky silhouette and space around the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance. The proposal would leave this important kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and

emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

375. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the tower would sit directly to the north of 20 Fenchurch Street, consolidating the Cluster. It would not obscure or detract from a City skyline landmark and would be an attractive addition to the skyline. It is considered, in both the baseline and cumulative scenarios, it would preserve the composition and character of these views.

376. As such, the proposal would preserve the setting and significance of St Paul's Cathedral in all relevant viewing experiences.

Views from other publicly accessible elevated viewing areas, in particular the "The 'Sky Garden' at 20 and 22 Bishopsgate, New Change, Tate Gallery, 120 Fenchurch Street Tate Modern:

377. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. This public benefit was integral to the planning balance in the Secretary of State's decision on the 20 Fenchurch Street planning application. The impact on it as a public attraction and sensitive receptor is a material consideration. The viewing experience offers a unique, 360-degree experience over different levels along a perimeter walk. Due to the siting and height of the proposal directly to the northwest of the 20 Fenchurch Street it would not block views of St. Paul's but would be seen in the views to the northwest as a new tower within the cluster.

378. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated to the left of 20 Fenchurch Street. The proposal would not affect an appreciation of other key aspects of the skyline from here, including St Paul's. The visual amenity of the viewing gallery is therefore considered to be preserved.

Other Borough Strategic Views:

379. The proposal's appearance in views from other neighbouring boroughs has been considered. In many instances the proposal's appearance would be very similar to the strategic views assessed above, and the impact would not change.

380. The London Borough of Tower Hamlets did not object, but responded to some views for consideration to the proposal's impact on the view of the World Heritage Site from Tower Bridge, and this impact is assessed in detailed above; officers conclude that no harm would be caused by the proposal in this view.

London Borough of Tower Hamlets:

381. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views of which model View A10 from the Wapping Wall bridge at the entrance to the Shadwell Basin is relevant. The Shadwell Basin provides a clear space over which the historic church spires of St Paul's Shadwell and St George in the East can be viewed. The City Cluster is visible to the west on the left-hand side of the view detached from the local context. In baseline and cumulative scenarios, the proposed development would be visible to the behind 50 Fenchurch Street, at considerable distance to the south west of the churches identified in this view, preserving the prominence of local designated landmarks and designated view 2, in accordance with LBTH Policy D.DH4.

City Landmarks and Skyline Features

382. The Protected Views SPD 2012 sets out a number of Historic City Landmarks and Skyline Features, that are underpinned by policy CS13 of the Local Plan. The majority of the landmarks are also designated heritage assets which may be discussed elsewhere in this report.

383. The proposal would not affect views of City landmarks and skyline features in accordance with CS13 (2). Those potentially affected by the proposals, are identified and assessed below:

St Paul's Cathedral (grade I)

384. The proposal's impact on pan-City views in which St Pauls Cathedral features is discussed in the LVMF sections above. The proposal is sited at some considerable distance from St Paul's (around 1km away) and would be firmly embedded in the Cluster of which it would form a new part.

385. St Paul's Cathedral has metropolitan presence in London along the riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. In these viewing experiences the proposal would clearly read as a separated and disassociated part of the Cluster and would not challenge, backdrop or erode its silhouette.

386. The unblemished visibility of the Cathedral along the Processional Route of Fleet Street and Ludgate Hill would be maintained. (THVIA Views 32A-32E).

387. In wider pan London views and approaches, the Dome offers a skyline presence in the broad London Panoramas discussed above, for example those from strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others.

Where visible in these views, the proposal would be seen at some considerable remove from the Cathedral, and would not backdrop or affect the clarity of the Cathedral's silhouette.

388. Officers consider that while visible, the siting of the proposals adjacent to 20 Fenchurch Street and in the context of the developing Eastern Cluster, and taking into consideration the scale, design, materiality, and colouration, the proposal would not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would be no encroachment on or erosion of the ability to appreciate its defining silhouette. Thus, the skyline presence of this City Cathedral is considered preserved.

Tower Bridge (Grade I)

389. Tower Bridge is an iconic and internationally recognised landmark of London, highly visible in riparian views. The proposals would be seen in views 11, 12 and 37 of the THVIA, including from Millenium Bridge, Butlers Wharf, and Kings Stairs Gardens. In these views, the proposals would be largely screened by 20 Fenchurch Street, and would nonetheless be read as part of the existing and established backdrop of tall buildings. The proposals would largely leave the visual experience of Tower Bridge unaffected, thus, the skyline presence of this City landmark is considered preserved.

Tower of London World Heritage Site (Grade I)

390. The Proposals would be seen in the context of the Tower of London World Heritage Site in views 7, 8, 9, 10A, 10B, 10C, 10D, 12, 13, 14 and 15 of the THVIA. As discussed elsewhere in this report, the proposals would be visible within, and would therefore result in a change to the wider setting of the WHS. However, the skyline presence of the WHS would be preserved by reason of the proposal's strategic siting within the long-established and consolidated Cluster backdrop, and, the intervening distance and height when viewed from in and around the Tower of London. The skyline presence of this City Landmark is considered preserved

Cannon Street Towers (Grade II):

391. The proposals would be seen as part of the wider backdrop behind the Station Towers in views from the South Bank. In such views, the development would form a group with the existing tall building at 20 Fenchurch Street. The proposal, taking into consideration its scale, design, materiality, and colouration, would not detract from the presence or contribution of the Station Towers within such views, allowing the Station Towers to remain distinct.

392. In some of these views, including in views from Southwark Bridge (THVIA View 36), the proposal would appear between the towers. Due to the existing background of tall buildings in such views, including 20 Fenchurch Street, as

well as the contrasting materiality and colour palette to the historic brick and lead of the Station Towers, their prominence and distinctiveness would be retained. Indeed, the proposal would appear in front of and occlude 52 Lime Street, visible in between the towers in this view, and would have a calm presence. Therefore, the skyline presence of this City Landmark is considered preserved.

All Hallows by the Tower, Byward Street (Grade I)

393. The proposals would be seen as part of the wider backdrop behind and to the right of All Hallows-by-the-Tower, in views from the east (THVIA View 10D). In such views, the development would join an existing and established backdrop of tall buildings, including 20 Fenchurch Street, which characterise long and mid-range views of the church from the east and southeast. The proposal, taking into consideration its scale and design, and partial occlusion by 20 Fenchurch Street in this view, would not detract from the presence or contribution of the Church within such views, allowing the steeple to remain legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

Lloyds of London, 1 Lime Street (Grade I)

394. The proposals would be seen in front of the Lloyd's Building in views from the Monument Viewing Gallery (THVIA view 45). In the proposed (non-cumulative) scenario, the eastern part of Lloyd's Building would remain visible. One reads the Lloyd's Building in the context of the surrounding cluster, with tall buildings on all sides, particularly with 30 St Mary Axe in the background and 20 Fenchurch Street in the foreground of this view. Considering the surrounding context, the skyline presence of this City Landmark is considered preserved.

Former Port of London Authority Building, 10 Trinity Square (Grade II)*

395. In Views 7, 10D and 13 of the THVIA, the proposed development would be seen in views with the Former Port of London Authority, it would appear above Minster Court which currently forms a backdrop to the listed building on the left side. The proposed development would not impinge on the skyline of the tower of this listed building. Its robust architectural form and contrasting materiality when compared to the Cluster buildings would remain a prominent element in these views.

396. Therefore, the former Port of London Authority HQ is considered to retain its prominence and visual strength. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

St Dunstan-in-the-East, St Dunstan's Hill (Grade I)

397. In View C5 of the THVIA the Proposed Development would introduce a new tall building to the northwest of the ruins of the Church of St Dunstan in the East as part of the southern part of the City Cluster. The Proposed Development would be largely occluded by 20 Fenchurch Street with only a small amount of the top of the proposal visible. The foreground church of St Dunstan in the East would remain the focus of the view. In the cumulative scenario the Proposed Development would be almost entirely occluded by 60 Gracechurch Street and would be a very minor background change within its wider setting to the northwest.

398. The proposal, taking into consideration its scale and design would not detract from the presence or contribution of the Church within such views, allowing the steeple to remain legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

St Magnus the Martyr, Lower Thames Street (Grade I)

399. The proposal would be visible in some views of the church from the south, including views from the western end of the Queen's Walk. In such views, the proposal would read as part of the Cluster, whilst providing significant breathing space between it and the Church, which would remain prominent and with a skyline presence related to the Monument. Thus, the skyline presence of this City Landmark is considered preserved.

St Vedast alias Foster, Foster Lane (Grade I)

400. St Vedast alias Foster is identified in the Protected Views SPD as city church with a skyline presence. In THVIA View C13 Additional Views December 2024, the proposals would be visible in the background of the spire of St Vedast Alias Foster which forms a minor element within the view. The architectural design of the proposed development would form a calm backdrop to the church spire, ensuring that it remains legible as a minor skyline element. The visibility of the proposed development in the background of the church spire would reduce as one moves eastwards in the direction of the Site, as shown in View C2. The tower of St Sepulchre Church would remain legible as the focal point in the foreground of the view, commanding the viewer's attention.

401. The impact would be a fleeting moment, and one taken together with the established views of the city cluster, the latter presently appreciated as a dynamic backdrop feature which frequently results in arresting contrasts of this nature. Given the fleeting moment and taking into consideration the significant distances between the proposed development, church and the viewing point on Newgate Street the skyline presence of this City Landmark is considered preserved.

Conclusion on City Landmarks and Skyline Features:

402. The proposal would preserve views of all relevant City and Non-City Landmarks and Skyline Features and comply with of CS 13 (2) and emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Conclusion on Strategic Views

403. The proposal would be sited at the western edge of the City Cluster, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views. In doing so, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.

404. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views. In consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace).

405. It would preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral and the Tower of London, it would preserve relevant neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features.

406. Following rigorous assessment, the proposal would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policies HC2, HC3 and HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas

407. The building is not listed or located within a Conservation Area. The proposed building would not, therefore, result in a direct impact on any heritage asset.

The Monument (Grade I and Scheduled Ancient Monument) THVIA 21

Significance

408. The Monument to the Great Fire (''the Monument''), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted

Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the sociopolitical context in which it was built. The monument is also an early example of a purpose built public viewing gallery and visitor attraction, the scale and design of which was intended to be dominant over its surroundings and command a London-wide presence.

409. It is of exceptional architectural, artistic, historic and archaeological significance as a City and London-wide landmark, it also holds notable group value with other Wren designs across the City.

Setting

410. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

Impact

411. The proposal would appear in views of the Monument up Fish Street Hill, THVIA view 21 shows the development to the left of the Monument in this view. The proposed development would introduce a new tall building towards the centre of this view, although much of it would be obscured by the intermediary mid-rise buildings on Fish Street Hill and as such only part of the upper half would be visible. It would appear lower in scale than both the foreground buildings and 22 Bishopsgate, which remains the tallest landmark in its backdrop, and as such would not considerably alter the existing skyline, conforming to the established scale and form of the Cluster which steps down in height to the south. It would not alter the ability to appreciate The Monument. The Monument would remain the view's focus with clear sky around it. The visible elements of the proposed development would be seen as an articulated and elegant addition to the skyline, with a clearly articulated crown and a soft tapering silhouette. It would contribute positively to the character of the Cluster and the townscape in this view (albeit in a way unrelated to heritage significance).

412. The proposal would also appear to the northwest of the Monument on approach from London Bridge and the South Bank. On approach from Lower Thames Street and Fish Street Hill the proposal would appear some distance away from the Monument, the proposed development would not impinge unduly on the silhouette of the Monument. The proposal would also be present in the viewing experiences of the Monument when looking south down Gracechurch Street, but would be sited a significant distance away, almost at a right angle, as a peripheral presence in the view.

413. In the cumulative scenario, 60 Gracechurch Street (committee resolution to grant approval) and 85 Gracechurch Street (approved) would stand between the Monument and the proposal and interrupt the intervisibility between the two, particularly in the viewing experiences along Fish Street Hill and Gracechurch Street.

414. Officers consider that while visible, the high-quality replacement building will not diminish the appreciation of the heritage asset and that there would be no harm the setting or significance of the Monument as a grade I listed building and Scheduled Ancient Monument.

Tower Bridge (Grade I) THVIA Views 11, 12 and 37

Significance

415. Tower Bridge, completed in 1894, was designed by famous engineer Sir John Wolfe Barry and architect Sir Horace Jones for the City of London Corporation. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge with a steel frame - the fantastical revivalist French medieval gothic exterior of towers, turrets and pinnacles comprising a High Victorian monument in the romantic medieval tradition, disguising the more modern structural innovation beneath. The dramatic symmetrical composition acts as a ‘portal’ to central London from its River. It has become an iconic and internationally recognised landmark of London

416. The building possesses very high architectural and artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings, and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London.

Setting

417. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Impact

418. The proposal largely leave the visual experience of Tower Bridge unaffected, including in views from the north, south and west. From Butler's Wharf and other views to the east, 20 Fenchurch Street would almost entirely screen the proposal from view.

419. The THVIA includes views from the River Thames on Millennium Bridge (View 37) and views from further east from Butlers Wharf (View 12) and Kings Stairs Gardens (View 11). Furthermore, 3D digital modelling techniques have been used in the assessment of the scheme and ensure a thorough analysis of the impacts on the setting and significance of Tower Bridge. Officers consider that the impact on views and setting of Tower Bridge has been fully assessed and the proposal would not result in harm to the setting and the significance of the grade I listed Tower Bridge.

St Paul's Cathedral (Grade I)

Significance

420. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting

421. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular

the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

a. Those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
b. The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
c. Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
d. Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact

422. The proposal is located over 1km away form the Cathedral at the western edge of the Cluster. Its long-range, strategic views presence and impact in relation to the Cathedral has been assessed in detail in the sections above, which conclude that the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Leadenhall Market (Grade II*) THVIA Views 27 and 28

Significance

423. Market complex of 1881 to designs renowned architect Sir Horace Jones, the City Surveyor. The Market comprises a series of roofed arcades disposed about a loosely cruciform plan (a layout preserving the medieval street alignment), with detached portions to the south, all lined with two storey units comprising shopfronts at ground level with offices/ancillary areas above. Of red

brick and Portland stone dressings, the architecture is essentially classical, with much flamboyant renaissance-inspired detailing, and plentiful depictions of dragons and other references to the City Corporation.

424. The Market possesses a high level of historic interest for its status as descendant ultimately of the Roman Forum-Basilica, and subsequently the medieval Leaden Hall – as a gathering-place for mercantile activity; and for its associations with Sir Horace Jones, the City Surveyor who designed many accomplished market buildings for the City. Leadenhall was his last market building within the City's boundary.

425. The Market possesses a high level of architectural/artistic and historic interest for its memorable fusion of the medieval, irregular street plan with Jones's formal Market arcades, resulting in oblique, happenstance views and delightful townscape juxtapositions. In this it was unique amongst Jones's City markets, the other two (Smithfield and Billingsgate) being more formally planned. Its high quality of design and construction illustrate the civic pride inherent in the planning and execution of such buildings.

426. Overall, the Market is considered to be of high significance.

Setting

427. Overall, the market draws a modest to moderate contribution from elements of setting to significance, in particular an appreciation of it. Most significance is intrinsic and inherent in the physical fabric, plan form and underground archaeology, rather than from setting.

428. To the west, south and east, the immediate setting of the Market is the Leadenhall Conservation Area in which it sits; the historic scale, architecture and urban grain of the CA provides a complimentary foil and sympathetic setting to the Market buildings. The same is true of the Bank Conservation Area lying further to the west across Gracechurch Street. These areas of setting support the historic and architectural/artistic significance of the listed building. Given the character of the market is somewhat self-contained, this wider historic environment makes a near moderate contribution to significance and an appreciation of it.

429. Located within the City Cluster of tall buildings, the setting of the Market to the north and east is of modern tall buildings; as set out in the assessment of the CA, these form a dynamic modern backdrop to the listed building, some of which are exceptional examples of commercial architecture of their time, such as the Leadenhall Building ('the Cheesegrater') and in particular the Lloyd's building, the group value with which Historic England's List Description describes as ''wonderfully incongruous'' with some complementary 'nods'. This makes a modest contribution to significance and an appreciation of it.

Impact

430. Where visible the proposal will be appreciated alongside 20 Fenchurch Street in the backdrop, such as looking south from Gracechurch Street (View 28) and Leadenhall Street along Whittington Avenue (View 27). This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views and is part of the markets setting. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market, Historic England have acknowledged the presence of tall buildings around the market and have suggested that the proposed building would not fundamentally change this context, which officers agree with.

431. Historic England have provided advice in their consultation report regarding the impact on daylight to Leadenhall Market, stating that the loss of daylight could cause harm to the Listed Building. An objection has been received from a neighbour, with wording of a similar effect. The market's covered spaces are currently artificially lit to ensure adequate lighting. The daylight levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building. A change in daylight levels would not harm the setting and significance of the listed building and the impact on sunlight and daylight is covered in detail in another section of this report.

432. Historic England have recognised the opportunity to provide public benefits, through the creation of a permeable connection to the market and improved public realm in general. The proposals would deliver an accessible and permeable new route through the building, increasing pedestrian permeability into the market. This would be an extension of the alleyways which surround the market. Furthermore, the proposed elevated public viewing gallery would result in better revealing its significance by affording views and appreciation of the historic and characteristic roof structures of the market. The proposals would support Leadenhall Market's current use by delivering complementary uses in the proposed development, which would drive footfall, supporting the economic sustainability of the listed building.

433. There proposals would not harm the setting or significance of the grade II* listed Leadenhall Market buildings.

<u>The Ship Tavern Pub, Lime Street (Grade II)</u>

Significance

434. This classical mid-19th Century former public house is located diagonally opposite the application site in Lime Street and is of architectural and historic

interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. On the main significance is drawn from the physical fabric and prominent principal elevation to Lime Street.

Setting

435. Setting makes a lesser, moderate contribution to significance, in particular an appreciation of it. This derives from the group value with the adjacent complementary historic buildings to the eastern side of the street, as well as the red brick frontage of the market visible on Lime Street Passage, the latter echoing the proportions and Victorian character of the listed building. The rear elevation of the site as existing is seen from the listed building rising significantly over the market. These views appear incidental and utilitarian, creating a 'back of house' character which detracts from the views towards the market.

436. The setting is also characterised by dramatic change in scale with a backdrop of the tall buildings of the Cluster .

Impact

437. The proposed high-quality architecture of the replacement building would sit comfortably within the setting of the Ship Tavern. The carefully designed podium that steps down towards Lime Street would respond to the lower height and smaller scale, whilst providing new, high quality and well detailed elevations which would be an improvement.

438. As such, officers consider that the proposal would not result in harm to the setting and the significance of The Ship Tavern public house.

<u>81-82 Gracechurch Street (Grade II) HTVIA View 28</u>

Significance

439. 81-82 Gracechurch Street is a good example of a later 19th century purpose-built office building in the Italianate manner, faced in well-detailed Portland stone. A style then associated with dependable business and finance in a City manner, it reincorporates a much older alley and a ground floor parade of shops. Its principal significance lies in its architectural design including façade details of the Gracechurch Street elevation and potentially its interiors. Its subservient secondary facades to Bull's Head Passage survive well, but are more subtle, of traditional white glazed brick and large tripartite sashed windows to optimise light in a dense setting, are of secondary interest. In the main, significance is drawn from the external architecture and plan form.

Setting

440. The building's immediate setting makes a positive contribution of two kinds to the significance of the listed building. Firstly, the building is experienced as a small group of classically detailed Portland stone buildings located on the opposite side of Gracechurch Street. The Lombardy classiscism exhibited along Lombard Street in particular is considered to establish the sense of a shared architectural decorative language, which sympathetically contextualises the architectural interest of the listed building.

441. The second contribution, albeit to a lesser extent, is the proximity to the western entrance of Leadenhall Market, with its red brick and Portland stone facades seen together with the listed building from the south and north along Gracechurch Street. The character of the market, with its fine-grained commercial buzz, reinforces the sense of activation of the ground floor commercial units within the listed building. Views of the market and listed building terminate in the tall façade of the Scalpel, which together with the modern building at No 20, break above the established building line. The immediate setting is therefore characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings seen alongside and behind.

Impact

442. THVIA view 28 shows the proposed building in the backdrop of the listed building in views looking south along Gracechurch Street, here the listed building can be seen obliquely. The proposal will change the immediate setting due to the increase in height compared to the existing building, the tower would appear in the background. The masonry podium would relate to the established scale on Gracechurch Street and the tower would continue a typical feature of the existing setting, where there are dramatic change of scale along Gracechurch Street

443. In the cumulative scenario the consented scheme at 85 Gracechurch Street would largely conceal much of the proposed development, while the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) would appear behind it. The proposed development would appear as a coherent part of a distinct group of tall buildings along Gracechurch Street.

444. The setting would not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

<u>7-9 Gracechurch Street (Grade II)</u>

Significance:

445. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style. It is located on the west side of Gracechurch Street to the north of the application site. Its significance lies in its architecture and historic interest.

Setting:

446. Its immediate setting features a mix of buildings in age, materials, style, and height, retaining a group value with a number of Portland Stone fronted buildings in the immediate surroundings. The building enjoys a green setting to the rear set around Castle Court. Its wider setting features a mix of buildings in age, materials, style and height. The juxtaposition of heights and architecture, including the City Cluster of tall buildings is part of the character of the setting.

Impact:

447. The proposal would be a high-quality addition to the south-eastern wider setting and there would be no adverse impact on the special interest of setting of the listed building. The proposals would appear on the other side of the Gracechurch Street to the listed building.

448. In the baseline scenario, the proposed building would, at the lower levels appear as a continuation of the existing street scene, with a human scale masonry mid height podium block sitting comfortably with its neighbours. The tower above would be visually disassociated from the listed building, and would not significantly change the existing character of Gracechurch Street and the setting of the listed buildings, where many tall buildings are present.

449. In the cumulative scenario, the consented scheme at 85 Gracechurch Street would be seen and experienced opposite the proposed development to the south, while the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) would appear to the south of it. The proposed development would, in both scenarios, appear as a coherent part of a distinct group of tall buildings along Gracechurch Street.

<u>39-40 Lombard Street (Grade II)</u>

Significance

450. Built 1868, by Frederic John and Horace Francis, this Portland Stone building is completed in an ornate Italianate palazzo manner. Comprising a tall ground floor, thought to be a former banking hall, the main facades are richly carved with classical detailing. It is of architectural, artistic and to a slightly lesser extent historical interest.

Setting

451. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. A historic setting is better preserved along Lombard Street, but the overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the City Cluster are seen in close proximity, including 6-8 & 22 Bishopsgate and 20 Fenchurch Street, creating a strikingly modern architectural contrast to the immediate surroundings of the listed building.

Impact

452. On approach from the west along Lombard Street, the backdrop of the listed building is commanded by the isolated bulk of 20 Fenchurch, which would be subdued by the proposals in both the baseline and cumulative scenarios. In the baseline scenario slivers of 70 Gracechurch Street would appear in front of 20 Fenchurch Street when viewed from the west, the proposals would read as an extension of the City Cluster and would not be harmful to the setting of the listed building.

453. In the cumulative scenario, 60 Gracechurch Street would stand before 20 Fenchurch Street and similarly command the backdrop. The full significance of the building is better appreciated in close view, in particular where the sumptuous detail can be appreciated, where given the scale of 39-40, and the height-to-width ratio of the street, the listed building would continue command the foreground, while the proposal would only be visible at a high level in the oblique. It is considered that the impact would be of low magnitude and no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street.

<u>38 Lombard Street</u>

Significance

454. Dating to the mid or late 19th century, this Portland stone building is designed in a classical style. It stands four stories tall with an added attic and a two-storey mansard roof. The facade features four windows, most with segmental arches. The ground floor is arcaded, adorned with polished pink granite pilasters. It is of architectural, artistic and to a slightly lesser extent historical interest.

Setting

455. Its wider setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. Its immediate

setting, however, is defined by its location at the eastern end of Lombard Street, seen alongside other classical Portland Stone commercial edifices, including nos. 39-40 Lombard Street, makes a modest contribution to significance overall.

456. The tall buildings within the City Cluster are seen to the north, including 6-8 and 22 Bishopsgate, and 20 Fenchurch Street to the west further cementing a modern architectural character to the surroundings.

Impact

457. On approach from the west along Lombard Street, the existing backdrop is commanded by the bulk of 20 Fenchurch. The proposed development would appear closer and more prominent than 20 Fenchurch Street appearing to the north in the view. Located further west into the street, this listed building benefits of more enclosure when approaching it from the west, affording more limited views of the existing tall buildings in its surroundings.

458. In any case, the full significance of the building is better appreciated in close view, where given the scale of 38, and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be partially visible in the oblique. No. 38 would continue to be seen in the context of the neighbouring nos. 39-40 Lombard Street, retaining its relationship with its existing historic context.

459. In the cumulative scenario the proposed development would be seen and experienced adjacent to the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) and 20 Fenchurch Street in the background in views looking west along Lombard Street. The proposed development would, therefore, appear as a coherent part of a distinct group of tall buildings along Gracechurch Street and the wider City cluster.

460. While the proposal would introduce a change in the setting of this listed building, it would cause no harm to the special interest, significance or setting of 38 Lombard Street and the ability to appreciate it.

<u>2-3 Philpot Lane (Grade II) THVIA View 23</u>

Significance

461. 2-3 Philpot Lane is a good example of post-Fire 18th century City ensemble, of a residential townhouse located off-street in an intimate courtyard behind attractive iron gates, which is and would have been fronted by commercial development. A late 17th century, post-fire house was likely re-developed in the 1720s and split into two, altered and split again for multiple occupation in the 19th century while the rear developed as a warehouse and associated office chambers. The building is now 5 storeys with the current main entrance

a narrow (3 bays) front on an attractive courtyard off Philpot Lane, stuccoed with parapet and sash windows and a good door architrave with carved consul brackets, whilst the western elevation is similar but plainer and more altered. The much more hidden northern elevation is of more interest, of red brick with moulded dressings and likely the earliest survivor of what remains, which, on the whole, is, modern fabric. That said some historic interior survives.

462. The asset is of high architectural and historic interest, and to a lesser extent artistic or archaeological, largely due to the off-street courtyard typology evident on the more authentic Philpot Lane side. The building's earlier, non-stuccoed fabric on the northern elevation adds to its historical integrity, while the more extensively altered western and southern elevations still contribute to the overall character.

Setting

463. The main contribution to setting derives from the close appreciation of the building within its courtyard off Philpot Lane, the non-public northern alley accessed from Philpot Lane, and the northern courtyard. To a lesser extent, Brabant Court also adds to this setting, with group value alongside 4 Brabant Court and 7-8 Philpot Lane (grade II* listed). The setting of 2-3 is characterised by intimate scale courtyards and alleys, affording mainly enclosed views of the immediate surroundings.

464. The wider setting of the asset has changed considerably over the years and now also includes large-scale modern buildings, particularly to the west (along Gracechurch Street) and to the east (No. 20 Fenchurch Street). These modern elements do not make any contribution to the setting or significance of the asset.

Impact

465. The Proposed Development would introduce a new tall building, seen to the left of the view and Philpot Lane (THVIA View 23). It would appear of a similar scale and proportion to 20 Fenchurch Street and in that manner would tie the separated 20 Fenchurch Street into the City Cluster. The proposed development would partly screen 22 Bishopsgate and would occlude One Leadenhall and 8 Bishopsgate. The podium which comprises the base of the proposed development would relate positively to the scale of the building on the opposite side of Lime Street. The materiality and colouration of the podium further responds to the character of the surrounding mid-rise buildings in the fore and middle ground, resulting in a contextual addition to the streetscape.

466. There would be no cumulative schemes visible in this view and the effect of the proposed development would remain the same as that for the proposed development considered in isolation. The elements of setting that contribute to the significance of the listed building would not be negatively affected by the

proposed development with only the carriage entrance being experienced in some oblique views.

467. Therefore, in both the baseline and cumulative scenarios, the proposal would preserve the setting and significance of the listed building, and the ability to appreciate it.

7-8 Philpot Lane (Grade II*) HTVIA View 23

Significance

468. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic and archaeological significance, less so artistic.

Setting

469. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.

Impact

470. THVIA View 23 shows that the proposal would be seen and appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane and located close to 20 Fenchurch Street. These dramatic contrasts in scale between the old and new are an established character trait of this setting which otherwise in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed building will continue to dominate.

471. There would be no cumulative schemes visible in this view and the effect of the proposed development would remain the same as that for the proposed development considered in isolation. Therefore, in both the baseline and cumulative scenario it is considered that the proposal would preserve the special interest and significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

33-35 Eastcheap (grade II*) & 23-25 Eastcheap (grade II) THVIA View 23

Significance

472. Two remarkable commercial buildings on Eastcheap showcasing the opulence and eclectic style of high Victorian architecture. Nos. 23-25, was built in 1861-62 by John Young and Son and features a Lombardic Gothic design with polychromatic brickwork, terracotta detailing on round-headed windows, twisted columns, and carved animals adorning the façade. The building has architectural interest as a mid-19th century commercial building, in an Italianate style as well as historic interest as a representation of the rapid growth in purpose built, larger scale commercial premises in the City during the 19th century.

473. Nos. 33-35, completed in 1868 by R. L. Roumieu, presents a striking composition with emphasised pointed Gothic arches, decorative diapered brickwork, marble accents, and intricate wrought ironwork. It has architectural interest as a distinctive Gothic design by the architect R. L. Roumieu, it also has historic interest as a mid-19th century Victorian commercial building and as a representation of the development of this typology across the latter half of the 19th century.

Setting

474. The immediate setting of 33 - 35 and 23-25 Eastcheap is informed principally by the neighbouring buildings of contemporaneous 19th century fabric and lie within the Eastcheap Conservation Area alongside similar scale 19th and early 20th century buildings. The wider setting of tall and very tall buildings of the City Cluster contrast with the historic buildings with 20 Fenchurch Street forming the northern setting and is seen prominently within their backdrop from the street.

Impact

475. THVIA View 23 shows that the proposed development would introduce a new tall building, seen to the left of the view and Philpot Lane. It would appear of a similar scale and proportion in this view to 20 Fenchurch Street. It would tie the separated 20 Fenchurch Street into the City Cluster whilst retaining a sky gap. The proposal would be prominent in the background of the listed buildings in views from the south. It would, along with 20 Fenchurch Street, create the emerging edge of the Cluster which would have a dramatic contrast in scale that is characteristic of this part of the City.

476. In close views, in both the baseline and cumulative scenarios, the listed buildings would continue to dominate the foreground while the proposal would be perceived as modern buildings in the background of the listed buildings. As

such it is considered that the proposal would preserve the significance and setting of nos. 23-25 and 33-35 Eastcheap, and the ability to appreciate them.

Adelaide House, King William Street (Grade II) HTVIA Views 18,19 and 20

Significance

477. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high architectural quality, historic interest as an art deco office building and its setting on the north east side of London Bridge and the River Thames.

Setting

478. Adelaide House is located at the north-eastern bridgehead of London Bridge, and as such has a prominent position in cross river views and from the bridge itself. Its monumental form and striking architectural details are fully appreciable from these vantage points to the south. It is appreciated within the lower scale of the riverfront buildings, with the tall buildings of the City Cluster in its backdrop. It derives group value with the wide number of early 20th century and mid to late 19th century buildings which inform a key layer of the City's history and characterise large parts of the townscape. The tall buildings in proximity to Adelaide House, most locally 20 Fenchurch Street, but also the wider profile of the fuller Cluster in views from the south, do not diminish the setting, or heritage significance; or ability to appreciate that significance as a noteworthy example of 1920s commercial architecture in the City.

Impact

479. Views 18, 19 and 20 of the THVIA illustrate the visual impact of the proposal on the listed building. Within these views the eastern cluster provides a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind.

480. In the baseline scenario the proposed development would add a high-quality element to the wider northern setting of the listed building which features a variety of old and new buildings of varying scale. The stepped form of the tripartite tower would be partially visible. The proposal would be an extension of the existing northern setting, where a collection of tall buildings which make up the City Cluster can be seen. The addition of the proposal would maintain the character of the backdrop and would not harm the setting or significance of the listed building.

481. In the cumulative scenario, the proposed development would be almost wholly screened by 60 Gracechurch Street. Only a sliver of the eastern edge of the proposed development would be seen beyond the silhouette of 60 Gracechurch Street from some angles of the listed building.

482. The tall buildings of the Eastern Cluster do not detract from the ability to appreciate its significance. The proposal would not adversely affect the significance or setting of the listed building.

Church of St Mary Woolnoth, Junction of Lombard Street and King William Street (Grade I)

Significance

483. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.

Setting

484. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. The backdrop of the church is informed by the curved western elevation of Capital House, a 7-storey refurbished and extended 20th century Portland Stone commercial building which is the most prominent element of the church's immediate setting. 20 Gracechurch Street, a 16-storey building, and 20 Fenchurch Street provide a taller context to the east and are prominent on the background skyline. New Court provides a taller context to the south of the church at St Swithin's Lane. However, more widely the setting of the church is also informed by the further tall and very tall buildings of the City Cluster to the north-east.

Impact

485. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. In the baseline and cumulative view, the foreground of Portland Stone classical buildings would be backdropped by the Cluster, creating a strong contrast in scale and character between the old and new City.

486. The Church in part is already backdropped by 20 Fenchurch Street, the proposal would form a continuation of that experience, it would be seen clearly as part of the City cluster, appearing visually separated from the historic streetscape in the foreground. The cluster and the historic foreground have a kinetic and transient relationship, from the junction of Lombard Street and King William Street, the Church is the pre-eminent foreground building with a skyline presence. The Church would still have a sky-backed skyline presence in important local views and would remain a prominent City landmark and skyline feature.

487. The impact of the development would be minor and no harm to the significance or setting of the church would arise, especially given the significant distance of the proposal to the east.

Church of St Edmund the King, Lombard Street (Grade I) THVIA View 31

Significance

488. Wren church, although attributed to Hooke by Bradley and Pevsner, dating from 1670-79. The church fronts onto Lombard Street. It is in Portland stone, with a rectangular plan and an attached southern tower, with a three bay quoined southern façade to Lombard Street, a side return with three round-headed arched windows, and an attached modern vestry extension to the rear at George Yard. Later tower, with arched belfry openings, dentilled cornice with a lead covered octagonal lantern and spire.

489. It is of very high architectural, historic, artistic and archaeological significance. Further interest derives from it being a post-Fire, Wren/Hooke, City church with the survival several original internal features.

Setting

490. The church fronts onto Lombard Street, with visibility of its western and northern elevations from George Yard to its west. It sits within the northern side of Lombard Street, within the Bank Conservation Area and as such is neighboured by a broadly cohesive and contemporaneous 19th century townscape informed by a similar datum and a commercial typology with an often Classical architectural style.

491. 20 Gracechurch Street, a 16-storey building, provides a taller neighbouring context to the immediate east of George Yard. 20 Fenchurch Street is also in proximity to the east of Lombard Street and is seen beyond the church in oblique west-east views. Also within the local setting of the church are the tall buildings to the east, those within the City Cluster, which provide a dynamic and dramatic contrast in scale to the setting which is characteristic of this part of the City.

Impact

492. The church is the focus of the view along Lombard Street and is seen with a backdrop of 20 Fenchurch Street (THVIA View 31). As part of the kinetic experience of moving eastwards down Lombard Street, the proposed development would move into its background.

493. In both the baseline and cumulative scenario, the historic buildings appear in the foreground with a contrasting backdrop of the City Cluster, this townscape contrast is typical of the City, and would be reinforced by the proposal. This would not detract from the significance of the Church or its neighbouring listed buildings. The distinction between the historic and contemporary buildings would remain clearly discernible.

494. The solidity of the materiality and softness of the curved corners would form an appropriate backdrop and would clearly be seen as part of the Cluster. The impact of the development would be minor and no harm to the significance or setting of the church would arise.

St Dunstan in the East (Grade I) THVIA View C5 Additional Views December 2024

Significance

495. The listed building includes a tower and steeple by Wren, constructed between 1695-1721 and the ruins, following bomb damage, of a later church, built between 1817 to 1821, based on designs by David Lang. In 1967–71, the ruins of the church were transformed into a garden, incorporating the restored Wren tower.

496. The surrounding environment of the church has changed over time, with the churchyard now playing a significant role in the appreciation and understanding of the church, making a very positive contribution to its significance.

497. The church's steeple is a material record of work in reconstructing city churches following the Great Fire. Views of the steeple of St Dunstan in the East, including from the riverside, as well as views shared with other Wren churches— St Margaret Pattens, and St Mary-at-Hill, including from the Monument Gallery—also contribute to the church's understanding and significance.

498. The building has high historic and architectural interest as a ruinous early 19th century church, featuring a post-Fire steeple and tower designed by Wren.

Setting

499. The ruins of the Church of St Dunstan in the East lie within their associated garden but otherwise within a more modern setting informed by commercial buildings mostly dating from the 20th century onwards. There are clear views along aligned routes towards the rebuilt tower from the south at Lower Thames Street, from the east along Cross Lane, and from the north along Idol Lane.

500. This modern setting of larger floorplate commercial buildings, particularly to the south and west do not contribute to the ability to appreciate and understand the heritage significance of the Church ruins. The prominent form of 20 Fenchurch Street is visible in the background of views of the church tower from St Dunstan's Hill, forming part of its backdrop. These modern elements of setting do not contribute to significance.

Impact

501. In View C5 of the THVIA addendum the proposed development would introduce a new tall building to the northwest of the ruins of the Church of St Dunstan in the East as part of the southern part of the City Cluster. In the baseline scenario, the proposed development would be largely occluded by 20 Fenchurch Street with only a small amount of the top of the proposal visible. The foreground church of St Dunstan in the East would remain the focus of the view. This part of the proposed building would read as a continuation of the existing City Cluster, set in the distant background, visually separated from the church.

502. In the cumulative scenario the proposed development would be almost entirely occluded by 60 Gracechurch Street and would be a very minor background change within its wider setting to the northwest.

503. The proposed development would not harm the setting or impact upon the heritage significance of this listed building.

Conservation Areas

Leadenhall Market Conservation Area

504. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance of the Conservation Area as derived from the vibrancy of the historic market, the characterful Medieval street pattern, small scale of buildings, streets and spaces in dramatic contrast to the immediate setting.

505. The site is on the boundary of the Leadenhall Market Conservation Area on Ship Tavern Passage and Lime Street. The proposals include public realm

enhancements to this public highway, largely resurfacing upgrading the existing surface materials. This would be a minor benefit to the Leadenhall Conservation Area, and views into and out of the conservation area along Lime Street and from Fenchurch Street.

506. The proposed tall building would be sited outside of but immediately adjacent to the Leadenhall Market Conservation Area and so would be a prominent new presence in some views into and out of it. Given the enclosed nature of the Conservation Area, the proposals would have limited intervisibility with the market itself. The streets and spaces of the Conservation Area, which are characterised by a dramatic context in scale beyond its extents, would have a similar character and experience to the existing condition. The proposal would appear most notably in views southwest, looking down Lime Street, as demonstrated by view 26 of the THVIA, in this view, the proposals would clearly read as sitting beyond the extents of the medieval street pattern, in the immediate foreground of this view, the more historic character and appearance of the conservation would retain its primacy. This experience is not unusual for the conservation area, in views north, the conservation area is backdropped by 22 Bishopsgate to the north, and in views south, further along Lime Street, 20 Fenchurch Street has a commanding presence appearing beyond the extents of the conservation area.

507. Where the proposals would be visible against Leadenhall Market, in views from Bishopsgate, the development will be appreciated alongside 20 Fenchurch Street in the backdrop. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market, with the historic buildings dominating the foreground of the views.

508. An objection has been received from a neighbour, regarding the loss of light to Leadenhall Market as a result of the development and how this will lead to a loss of character. The market's covered spaces are currently artificially lit to ensure adequate lighting. The daylight levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building, or the character and appearance of the conservation area. A change in daylight levels would not harm the setting and significance of the listed building or the character and appearance of the conservation area. The impact on sunlight and daylight is covered in detail in another section of this report.

509. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market Conservation Area.

510. The proposed podium relates to the general scale of building frontages in the Leadenhall Conservation Area and steps down in height from Gracechurch Street to Lime Street to respect the predominant scale and height of frontages

within the Conservation Area. The solidity of the proposed podium is characteristic of the materiality of the area.

511. The proposals include free public viewing gallery at levels 29 and 30, which would enable the public to enjoy elevated views from which observers could appreciate the conservation area and the distinctive roof structures of the listed II * Leadenhall Market.

512. At ground level, a new publicly accessible route would be provided through the building from Fenchurch Street linking the site to the Conservation Area at Ship Tavern Passage. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area. It would enhance the pedestrian experience and provide a new route into the Conservation Area, in addition it would provide active frontages to Leadenhall Market to the north of the site.

513. The new podium and tower building would not result in harm to the character, appearance, setting or significance the Leadenhall Market Conservation Area.

Eastcheap Conservation Area

514. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance as an area with strong historical associations with the Thames, with post-Fire landmarks and good commercial architecture occupying an ancient street pattern and urban grain. The setting is defined by an established relationship with modern tall buildings in the backdrop, such as 20 Fenchurch Street. The majority of Conservation Area views would be unchanged, given the particular dimensions and character of a unique historic urban grain.

515. The proposed tall building is not located in the conservation area, and it is situated on the north side of Fenchurch Street some way from the boundary but would impact on the setting of the Eastcheap Conservation Area in views looking north along Philpot Lane. The height, massing and architecture of the proposed building is typical of what characterises the existing wider setting and would not harm the character, appearance, setting or significance of the Eastcheap Conservation Area or views into or out of the Conservation Area along Philpot Lane.

Bank Conservation Area

516. The boundary of the Bank Conservation Area lies on the west side of Gracechurch Street, diagonally to the south west of the application site. The proposal will be visible from a number of vantage points within the Bank Conservation Area including along Lombard Street.

Significance

517. The Bank Conservation Area was first designated in 1971. The area comprises the commercial heart of the City of London around Bank junction. The character and appearance of the area comprises:

- Presence of some of London's iconic public buildings and many important churches
- Dominance of monumental, solid masonry buildings in classic style, often built for international corporations
- Highest concentration of grade I, II* and II listed buildings in the City
- Associations with nationally significant events and people

518. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. The contrast of medieval street plan, 18th and 19th century buildings and modern office developments is the quintessential character of the City of London which has evolved as a leading international commercial centre since Roman Antiquity.

519. Its character and appearance stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power. This is expressed through the sense of dramatic arrival at Bank Junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.

520. The Bank Conservation Area has been the financial and commercial heart of the London and the British Empire since the 18th century. Many significant buildings, for example the Bank of England, the Royal Exchange, and the headquarter buildings of large international companies, closely associated with important dates in British history, stand in close proximity.

Setting

521. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character of Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive. The historic buildings and scale of the Leadenhall Market Conservation Area form a modest positive contributor.

522. The development site at present makes a neutral contribution to the setting of the conservation area being seen in limited easterly views along Gracechurch Street and the junction with Lombard Street.

Impact

523. It is only in a few more open vistas would the proposal be visible. The proposal will be visible in some views as part of the distant backdrop as a fleeting, transient element alongside 20 Fenchurch Street. The impact is not considered harmful and is not an unusual relationship in the Conservation Area, with fleeting views of the City Cluster with the dynamic contrast of the historical City in the foreground and new City exemplified as the cluster of towers as a distant backdrop.

524. In those views north and south along Bishopsgate and Gracechurch Street, the proposal would read part of the cumulative Cluster of tall buildings. By reason of its complementary materials, and solid, robust and modelled masonry base there would be a positive dialogue with the scale and proportions of the Conservation Area opposite. The tower would form part of that prevailing contrast in scale on the eastern border of the Conservation Area.

525. View no 79 identified in the Bank Conservation Area Character Summary and Management Strategy SPD looks north along the boundary of the Bank Conservation Area on Gracechurch Street (View 22 in THVIA). The existing view features tall buildings in the backdrop setting to the north on Bishopsgate, both in the baseline and cumulative scenario. The proposed development would appear on the right in this view, against a backdrop of other modern tall buildings in the City Cluster. It would be entirely characteristic of the established, and thrilling, contrast between the old and new financial City.

526. Overall, the proposal would result in some minor change to the setting of the Conservation Area, but not in a manner which would be harmful to its character, appearance, setting or significance.

Other Heritage Assets

527. The setting of a heritage asset is defined in the NPPF as “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise, utilising 3D modelling, site visits and consideration of the submitted application

material, was conducted so as to identify heritage assets the setting of which may be affected. As well as those assessed in preceding paragraphs, the designated heritage assets considered included but not limited to:

- St Paul's Cathedral (Grade I)
- Lloyd's Building (Grade I)
- 7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):
- Church of St Edmund the King, Lombard Street (Grade I)
- 1, 13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II*)
- Church of St Michael Cornhill (Grade I)
- Church of St. Peter Cornhill
- Church of St Magnus the Martyr (Grade I)
- Church of St Clement, (Grade I)
- St Margaret Pattens (Grade I)
- St Peter Upon Cornhill (Grade I)
- Chapel Royal of St Peter ad Vincula (Grade I):
- Royal Exchange (Grade I)
- Merchant Taylors Hall (Grade II*)
- 66 and 67 Cornhill (Grade II)
- 2a; and 23 and 25 Eastcheap (Grade II)
- 48 Bishopsgate (Grade II)
- 40 Threadneedle Street (Grade II)
- Iron Gates in St Benet's Place (Grade II)
- 4 Brabant Court (Grade II)
- Custom House (grade I)
- Old Billingsgate Market (grade II)
- Barbican (Grade II, Grade II* RHPG)
- Finsbury Circus CA and RPG (grade II)
- Creechurch CA
- Various listed buildings not referenced in the assessments above within the Eastcheap, Guildhall, Finsbury Circus, St Helen's Place and Tower Conservation Area (London Borough of Tower Hamlets).

528. As a result of the scoping exercise, these assets were scoped out of the assessment above because officers judged that the proposal would not have the potential to impact upon their settings and the contribution made to significance. This is for a variety of factors, chiefly the relative distance of or minimal prominence of the proposal, or its limited to nil intervisibility, in the viewing experiences of these heritage assets. As such, the settings and the contribution they make to the significance of these heritage assets would not be adversely affected by the proposals.

Conclusion on Heritage

529. The proposal would preserve the special architectural and historic interest and significance and setting of strategic, landmark designated heritage assets, including St Paul's Cathedral, Tower of London, Tower Bridge and the Monument.

530. The proposal would not result in any harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the significance or setting of the listed buildings, Scheduled Monument and conservation area. The significance of the Tower of London and the ability to appreciate its OUV would be unharmed by the slight change to its setting and the cumulative impact of the scheme.

531. The proposals would not harm the setting or significance of other listed buildings in the vicinity identified in the THVIA, nor the settings or significance of the Leadenhall Market, Eastcheap and Bank Conservation Areas.

532. The proposal would not harm the setting of any designated and non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas and would therefore comply with Local Plan policies CS12, CS13 and DM12.1, emerging City Plan 2040 policies S11, S13, HE1, and London Plan policies HC1, HC2, HC3 and HC4

Archaeology

533. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

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

535. The planning application is accompanied by an Environmental Statement which contains an archaeology chapter and archaeological baseline as an appendix. Whilst there was no discussion of the public benefits of the scheme in regards to archaeology, there would be some benefit from use of images of the history of the site and the forum in the proposed digital video wall.

536. The baseline highlights that the site lies over the first and second Roman fora. Although the site has been extensively excavated previously, the design of the current building allowed for preservation in situ of some of the Roman fora deposits outside the deep basements. The preservation of these remains would be continued within the new development. Potential impacts on archaeological remains would be limited to two new piles in the south-eastern

part of the site. If archaeological remains of significance are identified within the new pile locations, there would be scope to move them.

537. The remains currently preserved on the site are located within a 'conservation structure'. As part of the development, this structure should be checked to ensure it remains robust and that the archaeology is not deteriorating. During the construction phase, the areas to be preserved in situ should be demarcated on site and communicated to all sub-contractors.

538. Historic England GLAAS have advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation and has therefore recommended conditions to manage the potential harm. However, subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Access and Inclusivity

539. The proposals have been assessed to ensure that they meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1 and S8. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers and that it is responsive to the requirements of all users. Policy HL1 of the draft City Plan 2040 further seeks to ensure that the City is a place that promotes equity, diversity, and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access. Policy CV2 of the draft City Plan 2040 relates to the provision of Arts, Culture and Leisure Facilities and states that the provision of arts, culture and leisure facilities should be encouraged where they would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming, and accessible for all. Policy CS19 of the Local Plan 2015 encourages additional publicly accessible open space.

540. The principles of inclusive design have been incorporated into the proposals and the scheme is designed to be highly accessible, with accessibility being considered for all levels of the building for both visitors and office workers.

541. The ground floor of the development is proposed to be highly permeable, with a number of entrances and a new route through the site. As part of the proposed Section 278 works the stepped entrance to Leadenhall Market from Ship Tavern Passage would be made an accessible route, and therefore enhancing this route and the entrance to Leadenhall Market.

542. Passenger lifts would provide access to the lower ground level and all upper areas of the main building, including the Level 32 Public Viewing Gallery. All lifts within the development would be designed to meet Part M requirements.

543. The submitted Fire Statement explains in detail the evacuation procedures, and the strategy has adopted best practice procedures for the evacuation of disabled people from all parts of the buildings.

544. Toilet facilities would include universal WC's and Accessible WC's on each floor with a choice of either right or left-handed transfer layouts. A Changing Places facility is proposed within the lower ground floor and Level 32 area. Details of the Changing Places facilities would be secured as a planning condition.

545. A 'Blue Badge' parking bay would be provided at ground floor level within the new public realm in the eastern area of the site, within the servicing area. Details of the car parking management of this space would form part of both the Delivery and Servicing Management Plan (secured by S106) and an Accessibility Management Plan (secured by condition).

546. For cyclists, 5% of cycle spaces should be suitable for larger cycles to meet London Plan policy T5B and London Cycling Design Standards 8.2.1. The dimensions of wider cycle storage locations are indicated on the plans and the size of the cycle lifts should meet London Cycling Design Standards. 5% of the short and long stay cycle provision is proposed within the basement level of the development. Access to the cycle storage would be steps and also a cycle lift from ground floor level. The cycle parking would be subject to further design development with details contained within an Accessibility Management Plan which would be secured by condition.

547. Step free access would be provided from the surrounding streets into all parts of the development. There are clear benefits for inclusive access from new step-free routes connecting the site in all directions. At detailed design stage, further information would be provided on gradients, planting, seating, surface materials, boundary edges, lighting and hazard protection.

548. In addition to the measures outlined above the following key design principles have been followed:

- All floorspace has level access, and lift access is provided to all floors;
- Level changes are mediated across the ground floor to allow level access throughout at acceptable gradients;
- Surface treatments, lighting, and design features would all be developed with access in mind;

- A compliant provision of accessible cycle parking spaces is incorporated into the scheme.

549. Overall, the proposal accords with the aims of the relevant policies. Further details of access and inclusive design would be secured via condition. The step-free access into the site at all the entrances and internally is a great benefit towards an inclusive City for all and is welcomed as part of the proposals. Subject to conditions it is considered that the proposal would meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1.

Highways and Transportation

Surrounding Highway Network and Site Accessibility

550. There is an established network of footways in the area immediately surrounding the Site, with footways provided along each of the adjacent roads.

551. The site is bounded by Gracechurch Street to the west, Fenchurch Street to the south, Lime Street to the East and Ship Tavern Passage to the North, and located on the corner of the signalised junction at Gracechurch Street, Fenchurch Street and Lombard Street.

552. Gracechurch Street is a Transport for London Road Network (TLRN), whereas the City of London is the Highway Authority for the other surrounding roads.

553. The Site is within close proximity to Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument, Cannon Street, Mansion House and London Bridge Stations. These stations provide access to various services on the London Underground, DLR, and National Rail networks. The Site is therefore considered well located to encourage sustainable trips, in accordance with policy T1 of the London Plan, which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

554. With regards step-free access at nearby stations, Liverpool Street features step-free access to the Elizabeth Line (linked with Moorgate station), Circle, Hammersmith & City and Metropolitan Lines. Bank station provides step-free access to the northern line and DLR.

555. The Site therefore benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b), as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

Trip Generation

556. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

557. The approach to calculating the trip generation was agreed with TFL and CoL and benchmarked against approved planning applications for office-led developments of similar scale within the City.

558. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 to 18:00 for the PM peak. The proposed development would attract office users, visitors to the proposed retail unit, and the cultural offers at ground level, lower ground level and the Public Viewing Gallery at Level 32 .

559. The trip generation assessment for the existing situation found that there were 328 Arrivals and 23 Departures during the AM peak, 351 two-way trips during the AM peak; and 33 Arrivals and 307 Departures, 340 two-way trips during the PM peak. The full break down of arrivals, departures and modes of transport are captured in the Transport Assessment.

560. A trip generation forecast was carried out for proposed land uses. The assessment anticipates 1,935 two-way trips for the AM peak, and 2,025 two-way trips for the PM peak.

561. Table 5.4 in the Transport Assessment (below) shows the net development trip generation when comparing the existing development to the proposed scheme. This represents the total proposed development trip generation minus the existing development trip generation.

Table 5.4 Forecast Net Trip Generation – Existing Scheme

Mode	Daily		AM Peak (08:00-09:00)		Midday Peak (13:00-14:00)		PM Peak (17:00-18:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Underground & Crossrail	2799	2730	527	37	423	353	73	528
Train	2943	2871	555	39	445	371	77	555
Bus	390	380	73	5	59	49	10	73
Taxi	32	31	6	0	5	4	1	6
Motorcycle	0	0	0	0	0	0	0	0
Car	0	0	0	0	0	0	0	0
Car Passenger	22	21	4	0	3	3	1	4
Bicycle	980	956	185	13	148	124	26	185
On foot	691	675	130	9	105	87	18	130
Total	**7857**	**7665**	**1481**	**103**	**1188**	**991**	**205**	**1481**

562. As a result, 1,584 net total trips are forecast during the 0800-0900 AM peak, and 1,686 net total trips are forecast for the 1700-1800 PM peak.

Deliveries and Servicing

563. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

564. The existing site is serviced through the two mechanical vehicle lifts, located at the southern end of Lime Street, facilitating the collection vehicles with a 4.25m restriction in height. Larger delivery and servicing vehicles currently turn right and then exit onto Fenchurch Street, whereas smaller vehicles use the route via Lime Street (northbound), and this is subject to complying with restrictions in Lime Street, which are from 8AM to 6PM.

565. For context, it should be noted that the consented scheme was proposed to be serviced via two vehicle lifts which provided access to a basement loading area. This is no longer proposed in order to reduce the embodied carbon of the proposal. A large proportion of the existing basement would be retained with the exception of existing basement level 02, which would be demolished to allow for a higher plant floor on the level below. This would be renamed as basement level 03. Overall, at-grade servicing would mean that the scheme can retain its existing basement as part of the refurbishment, and furthermore would not be reliant on vehicle lifts.

566. The servicing area for the proposed development is accessed from Lime Street, with vehicles entering and exiting the site in forward gear. Four loading bays would be positioned at ground level within the new dual-use public realm open space to the south-east corner of the site.

567. A framework delivery and servicing plan has been produced for the proposed scheme.

568. It is proposed that vehicles up to 8m in length would be permitted to access the service area, Vehicles would be able enter and exit the site in a forward gear, in accordance with DM16.5.

569. The existing site generated 56 trips for servicing and deliveries, with 9 of these occurring within the peak hour. It is anticipated that the proposed development would generate 54 trips per day, with 7 of these occurring within the peak hour.

570. Notwithstanding the above, in line with recent applications approved by the City of London, trips generated for servicing and deliveries are based on the assumption that 0.22 deliveries are required per 100sqm for Class E (office use), whereas for retail use this would be at 1.35 deliveries per 100sqm.

571. With this methodology applied, the proposal with 78,711 sqm (GIA) of office space is estimated to generate 173 trips per day. For the 195sqm (GIA) of retail space, the estimated number trips would be 3 per day, making a total of 176 trips per day.

572. The proposed development would use freight consolidation and would operate with a consolidation management strategy that would be secured as part of the Deliver and Servicing Plan in the Section 106 Agreement, which would reduce the number of vehicles travelling to the site by 50%.

573. If the 50% consolidation is applied to the 176 daily trips, then the number of daily trips would be reduced to 88 trips per day, covering all uses associated with the delivery and servicing of the proposed development, which is higher than the proposed 54 trips per day. Given that two trips are required per trip, (IN/OUT movements), the expected number of deliveries would therefore be 44 trips per day which would be required to facilitate this development. A further 4 extra deliveries would be allowed to account for the pop-up market which is likely to require deliveries, therefore bringing the total to 48 deliveries.

574. The table below demonstrates the modal split of the two-way trips required for the proposed development, with and without consolidation:

Mode	**% Modal split (office)**	**Trips No consolidation**	**Trips With 50% consolidation**	**% Modal split (retail)**	**Trips No consolidation**	**Trips With consolidation**	**Deliveries Total development***
Motorcycle /scooter	4	7	**4**	0	0	**0**	2
Car	34	59	**30**	25	0	**0**	15
LGV	53	92	**46**	25	1	**1**	23
Rigid 3 axle (HGV)	9	15	**7**	50	2	**1**	4
Rigid 4 axle (HGV)	0	0	**0**	0	0	**0**	0
Total	100	**173**	**86**	100	**3**	**2**	**44**

** adjusted to even numbers to represent the 2 way trips*

575. The proposal is acceptable with the criteria that the delivery and servicing daily trips are reduced by 50%, using the consolidation centres. The number of deliveries/servicing trips would be capped and the proposed mix would not

exceed the numbers as per the table above, and this would be secured in the Section 106 Agreement.

576. In addition, a booking system is required under the Section 106 Agreement that manages and allocates delivery/servicing slots for all land uses of this development. This is to ensure safety on the public highway and that no queuing would take place in and around the area. Also, the system must keep records of all trips generated following the occupation, and data kept thereafter. The trip records must be presented to the City of London upon request to ensure compliance.

577. As part of the delivering and servicing strategy, four loading bays are proposed to accommodate the maximum servicing demand per hour of the proposed scheme. One of these loading bays would operate as a blue badge bay during the daytime use of the public realm area, should a blue badge holder require parking for the workday. This provision fulfils the scheme's requirements for disabled car parking for the proposed development.

578. The blue badge bay adjacent to the loading bay would act as a fourth loading bay during the servicing hours between the hours of 22:00 to 06:00. This flexible arrangement would be fully managed by the on-site facilities management (FM) team.

579. It is anticipated that there would no conflict between the blue badge bay user and delivery/servicing activity, as deliveries and servicing would take place outside of typical office hours (i.e. 0800-1900).

580. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. It is anticipated that delivery and servicing would take place between 22:00 and 06:00 the following day.

581. The proposals for delivery and servicing comply with City Plan policy S9, due to the provision of on-site servicing facilities and encouragement of deliveries by cargo bike.

582. Overall, subject to a S106 obligation to secure a Delivery and Servicing Plan, it is not considered that the proposed servicing arrangements would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable. The proposals comply with Local Plan 2015 policies DM16.1 and DM16.5 securing the provision of blue badge spaces and car-free requirements. The proposals also comply with the emerging City Plan 2040 policies S9, VT2 and VT3.

Refuse Management and Waste Strategy

583. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

584. A Waste Management Strategy has been produced by the applicant, within the Framework Delivery and Servicing Plan, to outline details of how waste generated from the scheme would be collected/recycled.

585. Waste is currently stored and processed within the loading bay / servicing area.

586. Waste associated from the proposed development an external market space is proposed to be stored in bins at Basement Level 1, along with an in-bin compactor. Prior to collection, the bins would be transported from the waste store at Basement Level 1 to the loading area at ground floor level via the goods lift and collected by a private refuse company. This would ensure that refuse collection would be organised via a managed booking system.

587. To ensure that there are no conflicts with delivery and servicing activities, and to comply with the criteria on the hours of its use, it is recommended that collection of refuse/recycling is part of the same system that manages the delivery and servicing slots. The allocated slots for refuse/recycling would then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development.

588. Further detail regarding the refuse/recycling matters, for example, requesting the pick up points while not conflicting with other activities within the building, would be secured as part of the Servicing and Delivery Management Plan in the Section 106 Agreement.

589. The proposals comply with the current Transport Strategy, Local Plan 2015 on Policy DM 16.1, Policy 16.5 and Policy 17.1 ensuring that waste facilities are integrated within the building design.

590. The proposals are also in accordance with the emerging City Plan 2040 and its Strategic Policy S10 complying with Policy VT2 (freight trips).

591. Overall, the proposed refuse collection strategy is considered acceptable and in accordance with policies DM17.1, DM16.1 and DM16.5 of the Local Plan, as well as emerging City Plan 2040 policies S10 and VT2. Full details are to be secured within the Delivery and Servicing Plan under the S106.

Pedestrian Comfort

592. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experience on the street.

593. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc).

594. Pedestrian Comfort Levels are graded A+ (Comfortable) to F (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.

595. A PCL assessment has been undertaken on key footways and crossings within the local area based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.

596. A Pedestrian Comfort Level (PCL) assessment and pedestrian movement forecasts were carried out for the following footways and junctions:

- Gracechurch Street – North Point, Middle Point, South Point and South Lamp & Signal;
- Fenchurch Street – West, Middle and East;
- Lime Street – WS (two locations) and ES;
- Ship Tavern Passage – EW and NS.

597. Two scenarios were modelled:
- Scenario 1: 2032 Future Baseline without Development
- Scenario 2: 2032 Future Baseline with Development

598. In Scenario 1, the future baseline 2032 assessment would be consistent to the Baseline 2023 assessment resulting in scores on Gracechurch Street, Fenchurch Street, Ships Tavern Passage and the west side of Lime Street for the all representing comfortable levels. The eastern side of Lime Street again would continue to have a score of F, due to the narrow footway which is below 1.5m and therefore an automatic fail.

599. In Scenario 2, all Pedestrian Comfort Levels would be higher than C+ showing minor differences between future baseline scenario with and without the proposed development. In Scenario 2 the key area of focus is on the east side of Lime Street which would significantly improve with proposed Highways improvement works, secured via a Section 278 Agreement, ensuring a PCL target ranging from C+ to B depending on the time of day. Without any intervention, the PCL score for this part of Lime Street would be an F.

600. In order to secure that an appropriate PCL rating is achieved on Lime Street, it is recommended that works to meet a minimum of the tested scenarios are secured through S278 agreement. The results demonstrate that with this intervention, the net uplift in walking trips expected can, from a pedestrian comfort perspective, be satisfactorily accommodated via the proposed pedestrian network and highways interventions.

601. The scope of the Section 278 works can be found later in this report. The indicative design of the highway would be fully funded by the developer. The proposals comply with the current Local Plan 2015, in particular policy DM16.2, ensuring acceptable pedestrian movements, and with the emerging City Plan 2040 policy S10 (Active Travel and Healthy Streets) and Policy AT1 (Pedestrian Movement, Permeability and Wayfinding).

Car parking

602. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

603. Local Plan Policy DM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.

604. London Plan (2021) T6.5 (non-residential disabled persons parking) sets out that a disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

605. The existing building has no off-street parking facilities and the proposed development would be car free with the exception of one disabled car parking space at ground level within the dual-use public realm space. The disabled parking bay would be accessed from Lime Street and would have an additional 1.2-meter strip on each side to enable drivers to move in and out of the car easily.

606. The dual-use space would function as public realm space during the day and would be the location of the market space. The parking space would be available for use during the time when this development is open and would not be available from 10 pm to 6 am, during which time the area where the car

parking space is situated would function as a loading bay to facilitate deliveries and servicing.

607. The use of the accessible parking space and delivery/servicing bays would not interfere with the functioning of the pop-up market. Deliveries and servicing are proposed to take place when the market is closed between 22:00 and 06:00, and the accessible parking space would be designed to ensure there is sufficient space to enter and exit in a forward gear, as shown via the swept path analysis in the submitted Transport Assessment.

608. Within the vicinity of the site, there are other disabled car parking spaces located nearby on the public highway, with the closest located at George Yard (145m), followed by the Eastcheap (250m) and Mincing Lane (290m). These designated disabled bays can be used for up to four hours on weekdays, and with no limits during the weekends.

609. Although it is accepted that public transport provision at this location is at the highest level possible, in order to bring this proposal fully in line with the approved policies, a Travel Plan is recommended to be secured through the Section 106 Agreement.

610. The Travel Plan would support each disabled staff member in having a tailored travel plan detailing how they would get to and from the site and supported through different initiatives. Similarly, disabled visitors to this development can request support for their travel if public transport does not meet their needs. Not all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered, and could form part of the travel plan measures to support the disabled people.

611. The applicant would be required to keep records and manage the demand for disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, should form part of the Travel Plan. The action plan with initiatives is to be submitted for review to the Local Planning Authority annually.

612. Further details would be secured under the S.106 including management and the criteria for the use of the accessible car parking space. These details would be requested under the Travel Plan and shall include, but not limited to, the following:

- The disabled car parking space is available at all times to users of the building, except from the hours from 10PM to 6AM, when the use of the parking area requires a permission from the management company. Out

of hours parking slots could be available, if that area is not required for delivery and servicing activities.

- Responsibility for allocation of the car parking space, enforcement of parking contraventions.

- Criteria for applying to use the disabled car parking space, details on how the decision is made if more than one user is requiring the space at the same slot.

- Using the disabled car parking space is free of charge, in perpetuity, for employees of the building and other users of this building.

- Passive Electric Vehicle Charging (EVC) point to be included, with the plan to make it active charging point.

- Keep records of the car parking demand and the occupancy levels. Upon request, the applicant would need to submit records to the LPA.

613. The applicant would further be required to submit details of the gradients of this area as part of a planning condition to ensure level access is provided across this whole area.

614. Policy T6 of the London Plan sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons' parking for Blue Badge holders is to be provided in accordance with Policy T6.5 for non-residential elements of the development. The proposals are also in accordance with the emerging City Plan 2040 Policy VT3 and the Local Plan 2015 Policy DM16.5.

Cycle Parking

615. London Plan Policy T5 (Cycling) requires cycle parking to be provided at least In accordance with the minimum requirements set out within the plan. Policy T5 also requires cycle parking to be designed and laid out in accordance with the guidance contained within the London Cycling Design Standards, and that developments should cater for larger cycles, including adapted cycles for disabled people. The emerging City Plan 2040 Policy AT3 also accords with London Plan Policy T5.

616. The table below shows the cycle parking requirements of the scheme according to the London Plan Policy Standards (2021) with that proposed:

Land Use	London Plan Requirement		Site Requirement	
	Long Stay	Short Stay	Long Stay	Short Stay
Class E(g) – Office	1 space per 75sqm GEA	1 space per 500sqm up to 5000 sqm, then 1 space per 5000sqm GEA	1,101	26
Class E(a/b)	1 space per 175sqm GEA	1 space per 20 sqm GEA	2	11
Sui Generis	1 space per 8 FTE staff	1 space per 100 sqm (GEA)	1	14
Total Required			**1,104**	**51**
Total Proposed			**1,106**	**65**

617. 65 short stay cycle parking spaces are proposed for the development in compliance with the London Plan requirements. 19 spaces would be located at ground level on the eastern side of the public ream area. An additional 46 spaces would be provided within the cycle store at Basement Level B1 and for visitors of the development, alongside the long-stay accessible cycle parking spaces. Appropriate signage and wayfinding would be provided.

618. It is further proposed to re-provide 10 cycle spaces on the Lime Street western footway as part of the realignment proposal, providing a total number of 26 cycle parking spaces available for the public to use at ground level, representing a net increase of 11 spaces within the public realm.

619. 3 cargo bike spaces are proposed to be located by the pop-up market and public space to the south-east of the site, facilitating the delivery/servicing by bikes.

620. 1,106 long-stay cycle parking spaces are proposed at basement levels 1 and 2 in compliance with the London Plan requirements. This would be split between the basement level 1 (total of 164) and basement level 2 (total of 942), which can be accessed through a dedicated staircase with cycle channels. In addition, a cycle lift is provided to accommodate larger cycles.

621. The main dedicated cycle access is proposed via Lime Street, which leads to the area to disembark then cycle stairs which have a channel. It is predicted that 70 % of cyclists would use this route.

622. The alternative cycle access is proposed through the open space at the south-east of the site, leading to the area where the lift is positioned. 30% of cyclists are predicted to use this route.

623. Further details would be secured via condition detailing the size of the cycle access entrance from Lime Street, assessment on the numbers arriving/departing at peak periods, details on the cycle rail channels, including the cycle parking journey from on street to the parking space with full dimensions and gradients; and ensuring that the use of the goods lift does not interfere with use of the cycle lift.

624. 5% of the long stay, and 11% of the short stay spaces would accommodate accessible type bikes.

625. The cycle parking mix for long stay spaces is presented in the table below.

Type of Cycle Stand	Proportion	Numbers
Accessible Spaces (Sheffield Stand)	5%	50
Two-Tier Rack	82%	914
Brompton Bike Locker	10%	114
Semi-Vertical	3%	28
Total	100%	1,106

626. In addition to the long-stay cycle parking spaces, the scheme proposes 56 showers, including 10 accessible WC/showers, and 739 lockers.

627. Accessible end-of-trip facilities would also be provided for cyclists using larger or adapted cycles, to be designed and implemented using LCDS guidance. Larger accessible cycle parking spaces would be located at the first basement level in the main cycle store for people using adapted and larger cycles. These spaces represent 5% of the overall long-stay cycle parking provision, the proportion of which is fully compliant with the London Plan.

628. The final design of the end-of-trip facilities and cycle parking facilities would be secured by condition, and this should be designed using LCDS guidance as per London Plan Policy T5. This accords with the emerging City Plan 2040 Policy AT3. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required by Section 106 obligation to produce a Cycling Promotion Plan as part of a Travel Plan, which is required to address both the long stay spaces and also ensuring public access to the short stay spaces. It would need to be submitted to the City for approval in line with the London Plan Policy T4.

Travel Plans

629. The emerging City Plan 2040, sets out “a strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City’s streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.”

630. It includes: “a long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.”

631. The travel plan would need to be approved by the City of London prior to the occupation of the development. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

632. It should set out a detailed strategy designed to encourage safe, healthy, and sustainable travel options. This would assist in supporting the trips generated from this proposed development and its impact on the highways network as an effective tool for managing visitors, volunteers, and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

633. In addition to the aforementioned, the travel plan should also be supporting disabled people of this development, through inclusive travel planning measures. Each disabled staff to have a tailored travel plan, on how they get to/from the site, and supported through different initiatives. Similarly, disabled visitors of this development, could request support to get to/from site, if the public transport is lacking to meet their needs. Not all underground stations nearby have step free access, which means until all stations nearby are step-free, some users of this development may require additional support. Measures such as arranging a pick up from nearby underground station, or other pre-arranged locations should be considered, and could form part of the travel plan measures.

634. With an expected uplift of over 1500 trips generated from this proposed development; it is essential that the City seek to mitigate the impact on this development through requiring a Travel Plan. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

635. If planning permission is granted, a Travel Plan with a Cycling Promotion Plan, would need to be secured as part of the Section 106 planning obligation to meet London Plan policy T4, Local Plan Policy 16.1 and the emerging City Plan 2040 strategy Policy S9 and Policy VT1.

Construction Logistics

636. The London Plan, Policy T7 on deliveries, servicing and construction, the Local Plan 2015 and the emerging City Plan 2040, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

637. The detailed deconstruction/construction logistic plans shall be developed in accordance with TfL guidance per the latest standards and approved by the City of London and TFL, prior to the start of the construction of this development.

638. A preliminary Construction Logistics Pan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which would need to be in line with TfL's Construction Logistics Plan Guidance.

639. The logistics arrangements would be developed in consultation with the City's Highways Licensing and Traffic Management teams and TfL to minimise the disruption to neighbouring occupiers and other highway users. TFL has raised the need for a full Construction Logistics plan to be submitted and approved prior to commencement.

Highway Boundary/Stopping Up and Adoption

640. An area of land along Gracechurch Street is proposed to be stopped up, for which Transport for London is the Highway Authority, as well as the sections on Ship Tavern Passage and Lime Street, for which the City of London is the Highway Authority.

641. The total area to be stopped up would be 17.30 sqm, and the area proposed for adoption would be 20.81 sqm.

642. If the new link road is offered for adoption, this would be done as part of Section 38 of the Highways Act 1980. The applicant would be required to engage with the Highway Authority to agree details, such as: surface materials, sub-soil/construction, acceptable gradients, method of surface level drainage, position of the bollards, demarcation between the private and public highway, and other associated works.

643. The proposal does not include oversailing or undersailing of the public highway.

Section 278 and Section 38 Highways Works

644. The future development would attract a substantial number of pedestrians to the area. As part of these proposals, plans to enhance the public areas and the highways within the vicinity of the site are included.

645. It is acknowledged that significant changes are ongoing in the area due to the construction of tall buildings, leading to an increase in pedestrian flows, which can currently be accommodated within the existing highways network but increased future demand from the completion of such developments requires

significant improvement works to local highways infrastructure to accommodate the anticipated pedestrian numbers.

646. The necessary highway works to mitigate the impact of the development and improve the pedestrian experience (including post-construction) would be carried out as part of a Section 278/38 Agreement of the Highways Act 1980, in alignment with the City's requirements and aspirations for the area.

647. The works proposed to the public highway adjacent to the Site are (and are not limited to):

Fenchurch Street:

- Widening of the footways fronting the site
- Carriageway resurfacing
- Improvements to highways drainage within the frontage of the site
- Provision of road markings and associated traffic orders

Gracechurch Street (TFL):

- making permanent of the current buildout on Gracechurch Street, currently in place with temporary materials
- Carriageway resurfacing
- Reconstruction/Reinstatement of footways and associated works

Lime Street:

- Introduction of vehicular access within Lime Street and necessary accommodation works and removal of the existing access
- Realignment of the Lime Street carriageway crossing improvements at the junctions of Fenchurch Street (materials to match the public realm vision for the area), Philpot Lane and Lime Street
    - To consider the signalisation of this junction, as it was the case with the previously agreed Section 106 agreement where it refers to the TA as preferred option
- The study to consider all options to facilitate the pedestrian movements, for example: introducing a zebra crossing, unsignalized crossing with refuge island, informal crossing with raised table, including the option to signalize this junction to allow a pedestrian phase. If signalisation is the option selected due to proximity with the existing junction Gracechurch/Fenchurch Street, linking the two junctions is likely to be required. Crossing improvements at the junctions of Fenchurch Street, Philpot Lane and Lime Street to be implemented by the applicant (in accordance with City of London procedure) following the outcome of the feasibility study.
- removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route

Philpot Lane:

- Footway improvement works and associated works

- Carriageway resurfacing
- Highways Drainage
- Provision of road markings and associated traffic orders

648. Gracechurch Street forms part of the TfL Network red route. The applicant would need to enter a Section 278 Agreement with TfL for all highways, walking, cycling, and public realm improvement works.

649. A contribution towards the A10 safety, walking and cycling improvement project would be made. This has been calculated by TfL as £450,000. The applicant would either pay this sum towards the A10 improvement scheme or enter into a Section 278 Agreement with TfL for these works. A further £100,000 contribution is requested to part-fund a new cycle docking station on Rood Lane, however this is subject to agreement.

650. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy, and City of London's Public Realm vision. This would be secured through the Section 106 agreement, and an indicative plan is appended to this report (Appendix E).

Highways and Transportation Conclusion

651. Subject to the recommended conditions and planning obligations, the proposal would accord with relevant transport related policies including London Plan policies Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T6 Car Parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM16.1, DM16.2, DM16.3, DM16.4, and DM16.5, as well as DM3.2 and London Plan Policy D11 Safety, Security, and Resilience to Safety. It also accords with the emerging City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

Environmental Impact

652. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

653. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.

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

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

656. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe. The threshold would be breached if wind speeds exceed 15m/s for more than 1.9 hours of the year (0.022% of the time).

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

658. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances, and terraces

- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

659. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance
- Medium: two categories above criteria
- Small: one category above criteria
- Negligible: within suitable criteria.

660. Assessments have been carried out for both the windiest season and the summer season.

661. Eight configuration scenarios were tested in the wind tunnel tests. These configurations are a series of cumulative configurations, which separates out all consented developments, and those which have been submitted but not yet granted planning permission (referred to as “non consented cumulative schemes”). These configurations are listed below:

- Configuration 1: Existing site with Existing Surrounding Buildings;
- Configuration 2: Existing site with consented and Non Consented Cumulative Schemes;
- Configuration 3: Proposed Development with Existing Surrounding Buildings;
- Configuration 4: Proposed Development with consented Cumulative Schemes;
- Configuration 5: Proposed Development with Consented and Non Consented Cumulative Schemes;
- Configuration 6: Proposed Development with Existing Surrounding Buildings, Proposed Landscaping and Wind Mitigation Measures;
- Configuration 7: Proposed Development with Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures;
- Configuration 8: Proposed Development with Consented and Non Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures.

662. The Tier 1 Assessment (which accounts for the schemes that have planning consent or a resolution to grant within a 400m radius of the site) comprises 10 cumulative schemes in total which have either been granted or received resolution to grant. It is considered that Tier 1 Assessment represents a reasonable worst-case scenario.

663. The Tier 2 Assessment (comprising all consented schemes in Tier 1 with the addition of schemes pending determination) have also been considered in relevant testing configurations in accordance with the City of London's Wind Microclimate Guidelines, and includes schemes that 'may not be consented but are being designed at the time of planning submission.' The 4 schemes considered under the Tier 2 Assessment are:
    - 1 Undershaft – planning reference 23/01423/FULEIA
    - 60 Gracechurch – planning reference 24/00743/FULEIA
    - Bury House – planning reference 24/00021/FULEIA
    - 75 London Wall – planning reference 23/01270/FULMAJ.

664. It should be noted that the Tier 2 schemes listed above were included as Tier 2 schemes rather than Tier 1 as they were still pending determination when the application was submitted (1st August 2024). However, at the time of publication of this report, all of the above mentioned Tier 2 schemes have either been granted or given a resolution to grant, or in the case of Bury House, received a resolution to refuse by your Planning Applications Sub Committee. Technically, these schemes should now be moved into the Tier 1 assessment. However, the results of the wind testing have been thoroughly assessed, and it is considered that the subsequent grant or refusal of these schemes following submission of this application and the environmental information contained therein would not materially change the results insofar as to require the tier listings of the schemes to change and the tests be re-run and reported.

665. A ninth configuration was also tested, which incorporated temporary wind mitigation measures at off-Site locations which would not be required once cumulative buildings are completed to illustrate how certain off-site comfort exceedances could be mitigated.

666. It should be noted that Configurations 2, 4, 5, 7 and 8 were retested in the Wind Tunnel and CFD following the removal of the expired consents for 55 Gracechurch Street (planning reference 20/00671/FULEIA) and 130 Fenchurch Street (planning references 16/00809/FULMAJ and 19/00713/FULMAJ), and the inclusion of 99 Bishopsgate (planning reference 24/00836/FULEIA) and an addendum to the wind results were submitted.

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

Wind conditions at street level

668. In the existing baseline conditions (Configuration 1) the wind tunnel tests and CFD show that conditions around the site are range from suitable for frequent sitting use to uncomfortable for all uses. Further to the east around 20 Fenchurch Street where the conditions are windier, there is one location to the north of 20 Fenchurch Street which is categorised as uncomfortable in the windiest season, however this is in the road with no safety exceedances.

669. The effects of the proposed development with existing surrounding buildings (Configuration 3) wind conditions would range from suitable for frequent sitting use to uncomfortable for all uses during the windiest season. During the summer season, the wind conditions would generally be one category calmer, suitable for frequent sitting use to walking use. The windiest areas would remain Lime Street and the passageway underneath the proposed development.

670. Testing of the effects of the proposed development on wind microclimate has shown some on-site areas which would experience comfort exceedances. These include: The entrance to the viewing gallery use within the new public route; Two areas of the terrace at level 7; and four areas on the upper terraces for both office and public users. All of these areas of on-site exceedances are deemed to have Moderate Adverse impacts.

671. It is proposed to incorporate a number of features into the design of the building and landscaping to mitigate these impacts. These include:

- Updated massing to the south-western corner of the proposed development;
- Installation of a 3m tall baffle across the northern end of the passageway;
- Landscaping introduced to all upper level terraces and rooftop terraces, including planters with shrubs up to 1.5m in height, and pergolas with climbing/overhanging plants.

672. It is considered that with the mitigation measures above, these on-site areas would be fit for their intended uses.

673. In considering the completed development with the inclusion of the wind mitigation strategy at and surrounding the Proposed Development in the context of the existing surroundings (Configuration 6), wind conditions would range from suitable for frequent sitting use to uncomfortable for all uses during the windiest season. During the summer season, wind conditions would be generally one category calmer, suitable for frequent sitting use to walking use. In most locations the wind conditions would remain either in the same

categories as existing or become windier but would continue to fall within a category suitable for the intended use.

674. Whilst the general wind conditions in the context of the above would remain either in the same categories as existing, become calmer, or become windier but would continue to fall within a category suitable for the intended use, some off-site comfort exceedances are identified:
    - A temporary bus top located on the western side of Gracechurch Street, which is deemed to be a Major Adverse and significant effect (location 218);
    - Entrances to buildings at 159 Fenchurch Street and Alpha House/24A Lime Street (locations 103 and 124) which is considered to be a Major Adverse effect, which is significant;
    - A bench outside 20 Fenchurch Street (in itself intended to be a wind mitigation tool for that development – location 101) would experience a Major Adverse and significant effect;

675. Temporary mitigation measures have been identified which could be implemented for all of these off-site comfort exceedances:
    - Reinstatement of a dead tree outside 20 Fenchurch Street;
    - A 3 metre temporary baffle within the new route through the site;
    - A solid temporary screen at the bus stop on Gracechurch Street; and
    - Use of movable screens/windbreaks to the outdoor dining area on Lime Street Passage and on Bulls Head Passage.

676. Temporary mitigation measures are proposed because the Wind Tunnel Testing and CFD results show that these areas of comfort exceedances would become suitable for their intended purposes once all of the cumulative schemes (consented and non-consented) are completed.

677. Wind conditions for Configuration 2 (the future baseline scenario) show the wind conditions during the windiest and summer season respectively in relation to the Tier 1 and 2 Cumulative Schemes within the 400m radius of the site.

678. In the future baseline scenario, wind conditions would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions would be one category calmer at ground level compared to the windiest season, suitable for frequent sitting use to standing use.

679. In terms of pedestrian comfort for Configuration 2, wind conditions at and surrounding the site in the context of the cumulative surrounding buildings would be the same or calmer than those in the baseline scenario (Configuration 1). The windy conditions which were uncomfortable for all uses within the road on Fenchurch Street in Configuration 1 would be alleviated with the introduction of cumulative schemes and would be suitable for walking use. The windier than suitable conditions at the bus stop on Fenchurch Street, would persist (suitable

for walking use during the windiest season) with the inclusion of cumulative schemes. Furthermore, walking use wind conditions noted at the entrance represented by measurement location 359 identified in Configuration 1 would persist with the completed cumulative buildings. In the summer season, windier than suitable standing use conditions would persist at the benches around 20 Fenchurch Street.

680. The results of Configuration 2 therefore further conclude that several of the areas outlined previously which would result in wind conditions which would be unsuitable for their intended uses would be resolved when the cumulative buildings are constructed.

Cumulative Effects Assessment

681. Wind conditions in the context of the Tier 2 cumulative schemes (without any mitigation measures in place) have been wind tunnel tested in Configurations 4 and 5 respectively. Configurations 7 and 8 tested the wind conditions around the proposed development with the proposed wind mitigation strategy in place in the context of the Tier 2 cumulative schemes respectively.

682. Wind conditions for Configuration 7 (Proposed Development with Cumulative Surrounding Buildings and wind mitigation measures) show that the wind conditions would range from suitable for frequent sitting use to walking use during the windiest season, with the windiest areas located along Gracechurch Street and Leadenhall Street to the north of the site. During the summer season, wind conditions would be generally one category calmer, suitable for frequent sitting use to walking use. Generally the wind conditions would largely be materially the same as the condition in Configuration 6. The results show the wind conditions would remain either in the same categories or become calmer.

683. There is only one location in Configuration 7 (terrace on the southern elevation represented by measurement location 417) which would have wind conditions one category windier than desired for general amenity use (standing use conditions during the summer season). This is one category windier than in the context of existing surrounding buildings. As this area would be substantially landscaped, further additional mitigation measures which would be required once cumulative developments are completed would likely detract from other aspects of this terrace (such as daylight), and on balance would result in a less usable space. Furthermore, as the purpose of the area is an outdoor break area for the office space at this level, it is expected that standing use wind conditions would be tolerable for this purpose. Therefore, this wind condition would represent a Negligible (not significant) effect.

684. Configuration 8 tested the wind conditions at and surrounding the proposed development in the context of the cumulative surrounding buildings with the wind mitigation strategy in place and Tier 2 cumulative schemes. Wind conditions in this configuration would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions are expected to be one category calmer at ground level, suitable for frequent sitting use to standing use.

685. In terms of pedestrian comfort, wind conditions in Configuration 8 would be largely consistent with those in Configuration 7. However, the Tier 2 cumulative scheme scenario would result in windier conditions at two on-site terrace locations; measurement location 410 at the south-east corner of the podium terraces and measurement location 415 on the southern elevation terraces. These standing use wind conditions during the summer season would be one category windier than in comparison to Configuration 6 and 7, and one category windier than desired for private amenity spaces.

686. As discussed for measurement location 417 in Configuration 7, these areas are already thoroughly landscaped, and any further wind mitigation measures would severely impact other aspects of the area such as daylight. Since the intended use of these spaces is a break area for those in the offices, the standing use wind conditions would be acceptable as the level of activity would be similar to that of people at a waiting area. Therefore, due to the potential influence on other aspects of the site, and as wind conditions are expected to be tolerable, these wind conditions would represent a Negligible (not significant) effect.

<u>Retested Configurations following removal of 55 Gracechurch Street and 130 Fenchurch Street</u>

687. Following the expiration of the planning consents for 55 Gracechurch Street and 130 Fenchurch Street, and with the inclusion of the live 99 Bishopsgate planning application (planning reference number 24/00836/FULEIA) as mentioned above, the following configurations were re-tested in the Wind Tunnel and Computational Fluid Dynamics (CFD) to understand the impact of removing these expired schemes:

- Configuration 2: Existing site with consented and non-consented cumulative buildings;
- Configuration 4: Proposed Development with consented cumulative buildings;
- Configuration 5: Proposed Development with consented and non-consented cumulative buildings;
- Configuration 7: Proposed Development with consented cumulative buildings and mitigation measures;

- and
- Configuration 8: Proposed Development with consented and non-consented cumulative buildings and mitigation measures.

688. 99 Bishopsgate is located beyond the established 400m radius for assessment and therefore was not considered further.

689. Overall, the revised Wind Tunnel Testing and CFD has shown that largely the wind conditions for most on-site and off-site locations would not materially change as a result of these changes to the cumulative scenarios.

On-site

690. As a result of the changes to the cumulative scenario, due to the lack of shelter previously provided by 55 Gracechurch Street and potentially 130 Fenchurch Street, windier than suitable conditions were shown at two entrance locations within the ground floor passage of the proposed development (locations 345 and 355). In addition, podium level amenity (location 410), would experience calmer wind conditions and would therefore be suitable for intended amenity use.

691. In relation to location 345, conditions would be one category windier (walking use, with the target use of standing use) with only the consented schemes in situ (Configurations 4 and 7). They would, however, be suitable once the non-consented schemes come forward (Configurations 5 and 8). In relation to location 355, conditions would be uncomfortable and unsafe in Configurations 4 and 7. Once non-consented cumulative schemes are completed, wind conditions would improve such that their effects would no longer be significant.

692. The potential wind mitigation outlined in paragraph 195 of this report would need to be re-assessed for their effectiveness. It is acknowledged that the City is ever changing in its cumulative context, and so the assessment and commitment to any mitigation would be secured via condition and the Section 106 Agreement when the likely cumulative context is more certain.

Off-site

693. Wind conditions located at two entrance locations, to east of site the along Lime Street (locations 103 and 124), would be too windy (walking use, with the target condition of standing) with only the consented schemes in situ (Configurations 4 and 7). They would, however, be suitable once the non-consented schemes come forward (configurations 5 and 8). Therefore, it is proposed that further wind testing is subject to a planning condition to confirm what additional mitigation measures would be required.

Wind Microclimate Conclusion

694. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level.

695. Where there have been on-site and off-site exceedances identified (locations 101, 103, 121, 124, 345 and 355) which would have windier than suitable conditions in the context of the existing surrounding buildings which are windier than the baseline scenario, these would be alleviated with the inclusion of the cumulative schemes.

696. In the instance that not all cumulative schemes are built out, potential wind mitigation measures identified earlier in this report would be secured in the S106 Agreement.

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

698. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

699. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

700. Local Plan 2015 Policy DM10.7 ‘Daylight and Sunlight’ seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

701. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides

acceptable standards taking account of the Building Research Establishment's guidelines.

702. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states that when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

Assessment methodology

Daylight and Sunlight

703. The BRE guidelines "Site layout planning for daylight and sunlight – A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Overshadowing

704. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG) and transient overshadowing. The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

705. Sun Hours on Ground is undertaken on the equinox (21st March and 21st September), and tracks the sun's path to determine where the sun would reach the ground and where it would not. It is recommended that at least half an

amenity area should receive at least 2 hours of sunlight at the equinox, or that it should not be reduced to less than 0.8 times its former value.

706. Transient overshadowing consists of a series of shadow plans illustrating the location of shadows cast from the proposed buildings at different times of day and year. This includes 21st March (spring equinox), 21st June (summer solstice), and 21st December (winter solstice).

Interpreting results

707. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable, or negligible. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

708. With regards the impact of a development on overshadowing, as above it is recommended that at least half the area should receive at least two hours of sunlight on the equinox, OR that it should not be reduced by 20% from the baseline.

709. An assessment of the impact of the development on daylight, sunlight and overshadowing to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE7 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

710. Four scenarios have been tested:
- Existing Baseline
- Existing Baseline and Proposed Development
- Proposed Development and Cumulative Schemes (Tier 1)

- Proposed Development and Cumulative Schemes (Tier 2)

711. The two cumulative scenarios considered are:
    - Cumulative Tier 1: has quantitatively assessed consented schemes with the potential to generate additional effects in conjunction with the Proposed Development; and
    - Cumulative Tier 2: has qualitatively assessed consented schemes + submitted schemes with the potential to generate additional effects in conjunction with the Proposed Development.

712. Cumulative Tier 1 are the Cumulative Schemes deemed close enough in proximity (using professional judgement) based on their scale, relative distance from the proposed development and sensitive receptors and planning status to have the potential to generate cumulative effects. These are considered to be:

    - 85 Gracechurch Street (22/01155/FULEIA); and
    - Site Bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane (19/01307/FULEIA).

713. Cumulative Tier 2 considers all approved cumulative schemes listed above in addition to the following future development:

    - 60 Gracechurch Street - planning reference 24/00743/FULEIA

714. It should be noted that similarly with the Wind Microclimate, the Tier 2 scheme listed above was included as Tier 2 schemes rather than Tier 1 as it was still pending determination when the application was submitted (1st August 2024). However, at the time of publication of this report, the above mentioned Tier 2 scheme has been given a resolution to grant by your Planning Applications Sub Committee. Technically, this scheme should now be moved into the Tier 1 assessment. However, the results of the Daylight, Sunlight and Overshadowing testing have been thoroughly assessed, and it is considered that the subsequent grant of this scheme following submission of this application and the environmental information contained therein would not materially change the results insofar as to require the tier listings of the schemes to change and the tests be re-run and reported.

715. 55 Gracechurch Street (20/00671/FULEIA) was originally tested in the Tier 1 category, however due to its expiration the tests were rerun without the inclusion of 55 Gracechurch Street. This will be discussed in more detail later on in this section.

Assessment of impacts

716. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement. In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7), it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

717. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms in adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include places of worship, schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight.

718. In this case, Officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and Officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

719. The residential buildings and open spaces to be considered include those at 2-4 Bulls Head Passage, 4 Brabant Court, 9B Eastcheap, Jamaica Buildings, ancillary residential at The Ship Public House and The Grapes Public House. Impact on 14 amenity spaces is also to be considered.

720. The impact on four nearby churches were also assessed in the Environmental Statement, all of which experience a Negligible impact.

Daylight and Sunlight

721. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.

722. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

723. Both the London Plan 2021 and Local Plan 2015 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered when considering any reductions in daylight and sunlight assessed under the BRE methodology.

Existing Baseline results

724. A total of 17 buildings have been considered as sensitive receptors and assessed in the baseline for daylight. 14 of these buildings are considered to be sensitive to sunlight due to them having site facing windows with an orientation within 90° of due south. Three buildings, 4 Brabant Court, 1-4 Botolph Alley and 9 Eastcheap, are not sensitive due to sunlight impacts due to their location south of the site.

725. In the baseline condition across all properties tested, 22 of the 354 windows tested for VSC would meet the BRE's recommended levels. Only 25 of the 146 rooms tested for NSL would receive the BRE target of 80% NSL.

726. With regard to sunlight, within the 14 buildings assessed, 23 of the 192 windows assessed for would meet the recommendations for sunlight in the baseline condition.

727. As such, it is evident that the locality is significantly affected by the existing context of tall buildings in the baseline, consistent with the dense urban environment of the City.

Proposed development

728. When comparing the proposed development to the baseline, 307 out of 354 total windows tested would meet the BRE guidelines for VSC, that is a reduction of no greater than 20%. This equates to 86.7% compliance.

729. In this same scenario, of the 146 total rooms tested for NSL, 127 would meet the BRE guidelines being a reduction of no greater than 20%. This equates to 87% compliance.

730. 9 of the 17 properties assessed for daylight would meet the BRE criteria for both VSC and NSL and as such would experience a negligible impact where the effect is not significant. These are The Ship Public House, The Bunch of Grapes Public House, Jamaica Buildings, St Michael Cornhill Church. 1-4 Botolph Alley, St Clements Church, St Margaret Patterns Church, 5 Philpot Lane and 2 Philpot Lane.

731. For sunlight, of the 192 relevant windows tested, 175 (91.5%) would meet the BRE guidelines. Overall, 10 out of 14 of the properties assessed would meet the BRE guidelines. The four buildings which would experience a reduction in APSH and WPSH are 4 Bulls Heads Passage, 2-3 Bulls Head Passage, The Bunch of Grapes Public House, and St Michael Cornhill Church.

732. The assessment below will therefore focus on the remaining eight buildings with windows/rooms that see a reduction in VSC and/or NSL as a result of the proposed development, and the four buildings with a reduction in APSH and WSPH.

733. In the cumulative scenarios, the assessment further takes into account the removal of 55 Gracechurch Street, which, overall, lessens the magnitude of cumulative daylight and sunlight effects in relation to the following shared receptors: 4 Brabant Court; The Ship Public House, 4 Bulls Head Passage, Jamaica Buildings, St Edmund the King Church, St Maragaret Pattens Church, 2 Philpot Lane, 5 Philpot Lane, 9 Eastcheap and 11 Eastcheap.

Daylight

4 Brabant Court

734. 4 Brabant Court is in residential use and split over 4 floors.

735. For VSC, all 15 windows assessed see losses greater than recommended by BRE. Of these 15 affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect, whilst the remaining 14 windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. Due to the built-up nature of the surrounding context, these windows receive limited levels of VSC in the baseline condition, ranging from 4.2% at ground level and 10.4% VSC on the third storey.

736. The ground-level living spaces would experience absolute reductions in VSC of less than 2%, which is unlikely to be noticeable. The remaining affected windows, which serve a reception room, study, and bedrooms on the first to third storeys, would see similarly minor absolute reductions ranging from 2% to 3.7% VSC. These changes would be minimally perceptible, if at all, and the rooms in question are considered to be of secondary use.

737. For NSL, 7 out of 8 (87.5%) of the rooms would meet the BRE criteria, which is a negligible impact.

738. The affected room, a ground floor living room, would experience a 30.4% alteration in NSL, which would be classified as a Moderate Adverse effect, but this would only be slightly above the threshold. Given the low baseline NSL value of 27.5%, this alteration is unlikely to result in a noticeable change.

739. Overall, the daylight effect to this property is considered Minor Adverse (not significant).

4 Bulls Head Passage

740. 4 Bulls Head Passage is in residential use and split over 3 floors.

741. For VSC, 6 out of the 10 (60%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

742. For the 4 remaining affected windows, three would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. The final remaining window one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. Two of these windows serve first and second floor living rooms, and would experience absolute VSC changes of 1.9% and 2.6%, respectively. However, due to mitigating windows, these living rooms would remain BRE compliant when considering the room average VSC values. The remaining two windows serve a third floor Living/Kitchen/Dining Room (LKD), which would experience a 3% absolute change in VSC. This would be considered minimally noticeable.

743. For NSL, 2 out of 3 (66.7%) of the rooms would meet the BRE criteria, which is a negligible impact. The affected LKD at ground floor level, would experience a 27.5% alteration in NSL, which would be classified as a Minor Adverse effect. Given the low baseline NSL value of 15%, this alteration is unlikely to result in a noticeable change.

744. With regard to sunlight, 4 of the 10 windows assessed, would meet the BRE criteria for APSH or WPSH, experiencing a Negligible effect.

745. Overall, the daylight effect to this property is considered Minor Adverse due to the low existing VSC levels and high level of NSL compliance.

2-3 Bulls Head Passage

746. 2-3 Bulls Head Passage is in residential use and split over 3 floors.

747. For VSC, three out of the six windows (50%) assessed meet the BRE's criteria and are therefore considered to experience a Negligible effect. The remaining three affected windows serve bedrooms and would experience VSC alterations ranging from 20% to 29.9%, classified as a Minor Adverse effect. The absolute changes to these windows range from 1% to 2.5% VSC, which would be minimally noticeable. It is also worth noting the limited baseline VSC values for these windows, which range from 4.7% to 8.7%.

748. For NSL, five out of the six rooms (83.3%) assessed meet the BRE's criteria and are considered to experience a Negligible effect. The one affected room, a second-storey bedroom, would experience an NSL alteration of 27.1%, which is classified as a Minor Adverse effect. However, bedrooms are generally considered less critical in terms of daylight provision.

749. Overall, the daylight effects on this property are considered Minor Adverse (not significant).

St Edmund The King Church

750. St Edmund The King Church is a religious building split over 2 floors.

751. For VSC, 33 out of 34 windows (97.1%) assessed meet BRE's criteria and are considered to experience a Negligible effect. The single affected window, which serves the rear extension of the church building, would experience a VSC alteration exceeding 40%, classified as a Major Adverse effect. However, this window has a baseline VSC of just 0.1% in the existing scenario, making the alteration disproportionate. More importantly, the main nave would remain unaffected.

752. For NSL, five of the seven rooms assessed (71.4%) meet BRE's criteria and are considered to experience a Negligible effect. Of the two affected rooms, one would experience an NSL alteration of 20–29.9%, classified as a Minor Adverse effect, while the other would experience an alteration exceeding 40%, classified as a Major Adverse effect.

753. Overall, given the low existing VSC values, high compliance for VSC, and the significant NSL compliance, the overall daylight effect on this property is considered Negligible (not significant).

The Swan Tavern

754. The Swan Tavern contains residential uses from floors 2 to 4.

755. For VSC, five out of the 17 windows (29.4%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Among the 12 affected windows, three would experience VSC alterations between 20–29.9%, classified as a Minor Adverse effect, while four would experience alterations between 30–39.9%, classified as a Moderate Adverse effect. The remaining five windows would experience alterations exceeding 40%, classified as a Major Adverse effect.

756. For NSL, two out of the eight rooms assessed (25%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected rooms, three would experience NSL alterations between 30–39.9%, classified as a Moderate Adverse effect, and three would experience alterations exceeding 40%, classified as a Major Adverse effect.

757. This property is located adjacent to the north of the site, with all windows significantly obstructed by the existing surroundings. Consequently, the existing VSC values for these windows range from 2.4% to 9.2%, which are well below the BRE Guidelines (2022) recommendation of 27%. Similarly, the rooms served by these windows have existing NSL values ranging from 11.4% to 50.8%, far below the recommended 80%. Given these low baseline values, any alterations in VSC and NSL could result in disproportionate percentage changes, though these changes are unlikely to be noticeable to occupants.

758. Overall, considering the level of VSC and NSL compliance, the location of the affected windows and rooms at the rear of the property with very low existing levels, and the minimal impact on the front of the property, the overall daylight effect is considered Minor Adverse (not significant).

11 Eastcheap (previously reference as 9b Eastcheap)

759. 11 Eastcheap consists of retail at ground floor, with residential uses on the upper floors from floors 1 to 5.

760. For VSC, seven of the 18 windows (38.9%) assessed meet BRE's criteria and are therefore considered to experience a Negligible effect. Among the 11 affected windows, nine would experience alterations in VSC between 20–29.9%, classified as a Minor Adverse effect, while two would experience alterations between 30–39.9%, classified as a Moderate Adverse effect.

761. For NSL, eight of the 14 rooms assessed (57.1%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected rooms, three would experience alterations in NSL between 20–29.9%, classified as a Minor Adverse effect, while the other three would experience alterations between 30–39.9%, classified as a Moderate Adverse effect.

762. Overall, given the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Minor Adverse (not significant).

9 Eastcheap

763. 9 Eastcheap consists of retail at ground floor, with residential uses on the upper floors from floors 1 to 5.

764. For VSC, all windows assessed meet BRE's criteria and are therefore considered to experience a Negligible effect.

765. For NSL, three of the five rooms (60%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Of the two affected rooms, one would experience an alteration in NSL between 20–29.9%, classified as a Minor Adverse effect, while the other would experience an alteration exceeding 40%, classified as a Major Adverse effect.

766. Overall, considering the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Minor Adverse (not significant).

St Peter Upon Cornhill Church

767. St Peter Upon Cornhill Church is a religious building split over 3 floors.

768. For VSC, 23 out of 24 windows (95.8%) assessed meet BRE's criteria and are therefore considered to experience a Negligible effect. The single affected window would experience a VSC alteration between 20–29.9%, classified as a Minor Adverse effect.

769. For NSL, all rooms assessed meet BRE's criteria and are considered to experience a Negligible effect. Compared to the Consented Scheme, the variation in VSC is no greater than 0.1, and the NSL value remains unchanged.

770. Overall, given the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Negligible (not significant).

Sunlight

4 Bulls Head Passage

771. For APSH, the 6 windows experiencing losses, show losses between 20-29.9%, which is considered Minor Adverse. These windows serve first and second storey living rooms, and a third storey LKD, which would retain 16% to 18% APSH. This would be considered to remain reasonably well sunlit given the already dense urban location.

772. For WPSH, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

773. Overall, the sunlight effects on this property would be considered Minor Adverse due to the percentage reduction and retained values and would not be significant.

2-3 Bulls Head Passage

774. For APSH, five out of the six windows (83.3%) assessed meet BRE's criteria and are considered to experience a Negligible effect. The remaining window, which serves a third-storey bedroom, would experience a loss of 27.3%, classified as a Minor Adverse effect. However, this window would retain 16% APSH, which is deemed reasonable for an urban location. According to BRE guidance, bedrooms are generally considered less critical in relation to sunlight matters.

775. For Winter PSH, all assessed windows meet BRE's criteria and are considered to experience a Negligible effect.

776. Overall, given the high level of compliance, the sunlight effect on this property is considered Negligible (not significant).

The Bunch of Grapes Public House

777. A total of 10 windows were assessed for sunlight within this building, with one window (10%) meeting BRE's criteria for both Annual and Winter PSH and therefore experiencing a Negligible effect.

778. For APSH, 4 out of the 10 windows (40%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Of the remaining affected windows, five would experience alterations of 20–29.9%, classified as Minor Adverse effects, while one would experience an alteration of 30–39.9%, classified as a Moderate Adverse effect.

779. For WPSH, four out of 10 windows (40%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected windows, two would experience alterations between 20–29.9%, classified as Minor Adverse effects, while four would experience alterations exceeding 40%, classified as Major Adverse effects.

780. Despite these changes, the affected rooms retain APSH values of 19% or more, with one room retaining 30% or more, exceeding the BRE Guidelines (2022) recommendation of 25%. The absolute change in WPSH is just 1%, making the percentage alteration disproportionate to any noticeable impact on occupants.

781. Overall, the sunlight effect on this property is considered Minor Adverse (not significant).

St Michael Cornhill Church

782. A total of 24 windows were assessed for sunlight within this building, with 23 windows (95.8%) meeting BRE's criteria for both Annual and Winter PSH and therefore experiencing a Negligible effect.

783. For APSH, all windows meet BRE’s criteria and are considered to experience a Negligible effect.

784. For WPSH, 23 out of 24 windows (95.8%) meet BRE's criteria, also experiencing a Negligible effect. The remaining one window would experience an alteration in WPSH between 20-29.9%, classified as Minor Adverse

785. All these windows serve a single room, which retains an APSH value of 58% and a WPSH value of 8%.

786. Overall, the sunlight effect on this property is considered Negligible (not significant).

Cumulative Impact

787. Daylight and Sunlight has been assessed against the cumulative scenarios shown in Tiers 1 and 2.

788. The assessment below is a comparison of the magnitude of impact on daylight and sunlight in relation to the nearby sensitive receptors between the results shown in the proposed development and when cumulative schemes are in situ. The assessment also takes into account the retested scenarios with the removal of 55 Gracechurch Street.

Tier 1 Cumulative Scenario

789. For daylight, in the Tier 1 cumulative scenario 14 properties experienced a change in impact from the proposed development scenario assessment. For sunlight, 7 properties experienced a change in impact. These are listed below with the resulting impact. With the retesting following the removal of 55 Gracechurch Street, the results shown in the Environmental Statement submitted in August 2024 would either be reduced or remain unchanged, resulting in a cumulative scenario with lessened magnitudes of cumulative daylight and sunlight impacts:

790. 4 Brabant Court would have a Moderate Adverse (Significant) impact – this is reduced from Moderate to Major Adverse.

791. The Ship Tavern Public House: For daylight, this would have a Negligible (Not Significant) impact – this is reduced from Moderate Adverse (Significant); For sunlight, there would be a Negligible (Not Significant) impact.

792. 4 Bulls Head Passage: For daylight, this would have Negligible to Minor Adverse (Not Significant) impact – this is reduced from Moderate Adverse (Significant); For sunlight, there would be Moderate Adverse (Significant) impact compared to Minor Adverse (Not Significant) from the proposed development.

793. 2-3 Bulls Head Passage: For sunlight, there would be a Minor Adverse (not significant) impact compared to Negligible (not significant) from the proposed development, with the Minor Adverse impact being caused by the 85 Gracechurch Street consented scheme.

794. The Bunch of Grapes Public House: For daylight, this would have a Negligible to Minor Adverse (Not Significant) impact; For sunlight, there would be a Major Adverse (Significant) impact compared to Minor Adverse (not significant) from the proposed development.

795. Jamaica Buildings: For daylight, this would have a Negligible to Minor Adverse (Not Significant) impact – this is reduced from Minor Adverse; For sunlight, there would be a Moderate to Major Adverse (Significant) compared to Minor Adverse (not significant) from the proposed development.

796. St Michael Cornhill Church: For sunlight, this would remain unchanged as a Negligible (not significant) impact.

797. St Edmund The King Church would have a Negligible to Minor Adverse (Not Significant) impact – this is reduced from Minor Adverse.

798. 1-4 Botolph Alley would have a Negligible (Not Significant) impact in terms of daylight but would overall have improved VSC conditions in the Tier 1 cumulative scenario with the removal of 55 Gracechurch Street.

799. St Margaret Patterns Church would have a Negligible (Not Significant) impact in terms of daylight – this is reduced from Minor Adverse.

800. The Swan Tavern Public House would have a Moderate to Major Adverse impact. The magnitude of impact occurs due to the existing low levels in this constrained location. The additional alterations occurring from the cumulative developments may not be noticeable, however, due to the greater magnitude of impact, the effect on daylight levels within this property is considered Moderate to Major Adverse (Significant), compared to Minor Adverse from the proposed development.

801. 5 Philpot Lane: For daylight, this would have a Negligible (Not Significant) impact. This is reduced from Moderate to Major Adverse (Significant); For sunlight, there would be a Negligible (not significant) impact, reduced from Moderate Adverse with the removal of 55 Gracechurch Street.

802. 2 Philpot Lane: For daylight and sunlight, this would have a Negligible (Not Significant) impact.

803. 11 Eastcheap would have a Minor to Moderate Adverse (Significant) impact. This is reduced from Major Adverse;

804. 9 Eastcheap would have a Minor to Moderate Adverse (Significant) impact. This is reduced from Major Adverse;

805. St Peter Upon Cornhill Church: For daylight, this would have a Moderate Adverse (Significant) impact in the Tier 1 cumulative scenario, compared to Negligible (Not Significant) in the proposed development. For sunlight, there would be a Moderate Adverse (Significant) impact compared to Negligible (not significant) from the proposed development. These adverse impacts would be caused by the 85 Gracechurch Street consented scheme.

Tier 2 Cumulative Scenario:

806. The Tier 2 Cumulative Scenario assesses the proposed development in conjunction with the surrounding cumulative schemes in Tier 1, as well as the committee approved scheme at 60 Gracechurch Street.

807. For daylight, only two properties experience a change in impact from the proposed development scenario assessment:

808. 4 Brabant Court would have a Moderate to Major Adverse (Significant) impact, compared to Minor Adverse from the proposed development because of the 60 Gracechurch Street development.

809. 2 Philpot Lane would have a Major Adverse (Significant) impact, compared to Negligible from the proposed development as a result of the 60 Gracechurch Street development.

810. In terms of sunlight, there would be no changes to the magnitude of impact for the sunlight or overshadowing assessment for the Tier 2 cumulative assessment compared to the Tier 1 cumulative assessment. Therefore, the 60 Gracechurch Street scheme should not result in any additional sunlight or overshadowing cumulative effects.

Conclusion on Daylight & Sunlight impact

811. The submitted Daylight and Sunlight chapter of the Environmental Statement shows an overall high level of compliance with the BRE Guidelines 2022 on many of the properties tested. Where there are transgressions, it is noted that the dense urban environment of the City, and in particular the Cluster, is such that properties experience low values in the existing baseline scenarios, and any reasonable increase in massing proposed in order to meet the aims of the development plan and priorities for the CAZ on delivery of office floorspace, would appear to disproportionately affect any percentage reduction. .

812. Overall, whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in unacceptable impacts overall and is therefore in compliance with Local Plan Policy DM10.7, London Plan Policy D6(d), and Draft City Plan 2040 Policy DE7.

Overshadowing

813. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March. The sunlight

amenity and transient overshadowing analysis was undertaken in accordance with the guidelines.

814. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

815. In the baseline, of the 14 amenity areas tested for overshadowing, 7 roof terraces would meet the BRE's criteria of receiving two hours of sun on March 21st on at least 50% of their total area. These are 31-32 Lombard Street roof terrace, 85-87 Gracechurch Street roof terrace 01, 2-4 Bulls Head Passage rooftop amenity, 15-18 Lime Street roof terraces 01, 02 and 04, and 8-13 Lime Street roof terrace. The remaining 7 areas – St Edmund the King Church, George Yard, Church of St Michael Cornhill, St Peter upon Cornhill, 85-87 Gracechurch Street roof terrace 02, 15-18 Lime Street roof terrace 03 and Leadenhall Market - do not meet the criteria.

816. With regards to Sun Hours on Ground (SHOG), of the 14 amenity areas tested with the proposed development in situ, 10 would meet the BRE criteria, experiencing less than a 20% alteration when compared to the baseline scenario. They would therefore experience a Negligible (not significant) impact from the shadow cast from the proposed development.

817. The remaining four areas would see alterations greater than 40% which is considered Major Adverse (Significant). These areas are 85-87 Gracechurch Street roof terrace 01, 2-4 Bulls Head Passage rooftop amenity, and 15-18 Lime Street roof terraces 03 and 04.

818. Roof Terrace 01 at 85-87 Gracechurch Street and the rooftop amenity at 2-4 Bulls Head Passage receive only very marginally above the two hour criteria, and therefore the reduction in sunlight hours would only need to be approximately 1 hour of less to fall below the recommendation. Furthermore, should the consented development at 85 Gracechurch Street be implemented, roof terrace 01 would be demolished and therefore the overshadowing impact to this amenity space would no longer be applicable.

819. With regard to roof terraces 03 and 04 at 15-18 Lime Street, it is noted that the use of these terraces are unclear. Therefore, it is acknowledged that these areas could be used as outdoor amenity areas and so are assessed as a worst-case scenario. Should this area serve an inaccessible roof area which is not used for amenity purposes there would be no effect.

820. Transient overshadowing was also undertaken. At the equinox (21 March/September), shadow would be cast from the proposed development at 8am, moving clockwise. Between 1pm and 4pm, the roof of Leadenhall Market would be partially overshadowed by the shadow cast from the proposed

development. The remaining amenity areas would be unaffected by the shadow cast from the proposed development.

821. At the summer solstice (21 June), shadow is cast from the proposed development from 6am, moving clockwise. Between 2pm and 4pm the roof of Leadenhall Market would be partially overshadowed by the shadow cast from the proposed development. The remaining amenity areas would be unaffected by the shadow cast from the proposed development.

822. At the winter solstice (21 December), shadow is cast from the proposed development from 9am, moving clockwise. No additional shadows cast from the development would reach any of the 11 14 amenity areas on this day.

Cumulative Impacts

823. In the Tier 1 cumulative scenario, in the transient overshadowing test at the Equinox (21 March/September), there would be an additional impact through additional shadows cast to the roof of Leadenhall Market and St Helen's Bishopsgate Churchyard. Between 1pm and 4pm the roof of Leadenhall Market would again be partially cast in shadow from the proposed development. At 2pm, a shadow from the cumulative schemes would encroach onto Jubilee Gardens, which would clear by 3pm. The remaining amenity areas would be unaffected by the shadows cast from the proposed development. The overshadowing effect to all amenity areas on this day would therefore be considered to be Negligible (not significant).

824. At the summer solstice (21 June) there would be an additional impact between 11am and 12pm, with St Helen's Bishopsgate Church yard cast in shadow from the cumulative schemes, and the roof of Leadenhall Market cast in shadow from the proposed development between 2pm and 4pm. The remaining amenity areas would be unaffected by the shadows cast from the proposed development.

825. At the winter solstice (21 December) there would be no additional impacts as a result of the proposed development and cumulative schemes.

826. Further in the cumulative scenario, in the Sun Hours on Ground test, the same 10 amenity areas would continue to experience a Negligible (not significant) impact. Roof Terrace 01 at 85-87 Gracechurch Street and the rooftop amenity at 2-4 Bulls Head Passage would experience an increased magnitude of impact as a result of the cumulative schemes, but as with the proposed development, these two areas receive only very marginally above the two hour criteria, and therefore the reduction in sunlight hours would only need to be approximately 1 hour of less to fall below the recommendation. Roof terraces 03 and 04 at 15-18 Lime Street would not experience a change in the magnitude of impact.

827. In the Tier 2 cumulative scenario, there are no changes to the magnitude of impact for the overshadowing assessment for the Tier 2 cumulative assessment compared to the Tier 1 cumulative assessment. Therefore, the 60 Gracechurch Street scheme would not result in any additional overshadowing cumulative effects.

828. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area or surrounding properties and therefore the proposal complies with, policy D6 of the London Plan, DM10.7 of the Local Plan and DE7 of the emerging City Plan.

Solar Glare

829. Glare is the discomfort or impairment of vision caused by excessive or large contrasts in luminance within the observer's field of view, and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high luminance source within a low luminance scene which impairs vision).

830. For discomfort glare, the key issue is the total duration of time for which the sun can be reflected to the sensitive location. Durations of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

831. The assessment assumes a day with no cloud cover and so the maximum potential sunlight is assessed. No change in climate will alter the effect of the analysis.

832. No railway line or rail station sensitive receptors are within the relevant study context, so the assessment has focused on road receptors. The following streets have been assessed along their lengths with viewpoints at regular intervals, giving 175 viewpoints, all of which have high sensitivity:

- Gracechurch Street, northbound (extending to London Bridge, King William Street)
- Gracechurch Street, southbound (extending to Bishopsgate)
- Fenchurch Street, westbound
- Lombard Street, eastbound
- Cheapside, eastbound
- Poultry, eastbound
- Philpot Lane (extending to Botolph Lane)

833. In the submitted addendum to the Environmental Statement, Solar Glare was not assessed or considered further as solar glare is not assessed cumulatively. The solar glare assessment therein focuses on the August 2024 Environmental Statement.

834. At Gracechurch Street northbound and southbound, there would be no instances of reflected glare greater than 500cd/m2, resulting in a negligible impact where the effect is not significant.

835. At Fenchurch Street westbound, reflected glare instances greater than 500cd/m2 were found to occur as a result of the Proposed Development for approximately 44 days per year, with duration up to 15 minutes and spatial extent to 30-40 metres. These were primarily found in May, June, July and August, between 16:30-17:30. This disability glare gives a major adverse impact where the effect is significant.

836. At Lombard Street eastbound, reflected glare instances greater than 500cd/m2 were found to occur as a result of the Proposed Development for 4 days per year, with a duration of 7 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.

837. At Cheapside eastbound, reflected glare instances greater than 500cd/m2 were found to occur as a result of the Proposed Development for 8 days per year, with a duration of 9 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.

838. At Poultry eastbound, reflected glare instances greater than 500cd/m2 were found to occur as a result of the Proposed Development for 6 days per year, with a duration of 7 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.

839. At Philpot Lane, no instances of reflected glare greater than 500cd/m2 were found to occur as a result of the Proposed Development, resulting in a negligible impact where the effect is not significant.

840. As the Environmental Statement has identified potential adverse impacts with significant effects, mitigation options were assessed particularly to the receptors on Fenchurch Street. The ES has recommended mitigation measures including a fritted surface finish with a frit density of 30% coverage by area on the outside surface of the glazing on levels 6 to 10 of the southeastern façade/corner of the Proposed Development.

841. With this proposed mitigation in place, the reflected solar glare occurrence is reduced to 7 days per annum, primarily in May, with a spatial extent of 15m or less and a duration of 7 minutes at most. When considering the probability of sunshine in May, approximately 40%, the potential for harmful glare for 7 days

per annum is reduced to 3 days per year. This would be considered moderate adverse but the effect would not be significant.

842. Overall, the potential impact of solar glare from the proposed development on most nearby road receptors is considered negligible-minor adverse and the effects are not considered significant.

843. For the instances of moderate-major adverse impacts and possible significant effects, it should be noted that the assessment for solar glare assumes the worst-case scenario, that the sun will shine every day during daylight hours. Climate data indicates that this is not the case in the UK generally.

844. The final materials and design would act to reduce both the incidence of solar glare and the light pollution by restricting the passage of light or reflected light from the façade of the proposal to sensitive receptors. The potential glare from the proposed new building could be tempered through the use of fritting as outlined above as a recommended mitigation measure. Further details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare and solar convergence.

845. Overall, subject to the mitigation measures identified it is considered that the effects on solar glare would be acceptable.

846. If planning permission were to be granted, an obligation within the s106 Agreement would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

847. Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.

848. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE8 and the Lighting SPD.

849. The Site and its surroundings are defined as a high distinct brightness, which the Institute of Lighting Practitioners (ILP) Guidance Notes classify as Environmental Zone 4 (E4). Within E4, the recommended limit of light spillage is 25-lux pre-curfew (11pm) and 5-lux post-curfew.

850. The potential light spillage impacts arising from the Proposed Development upon the surrounding existing residential and religious receptors has been assessed. The following properties have been identified as light spill receptors of moderate-high sensitivity:
    - The Swan Tavern
    - 2-3 Bulls Head Passage
    - 4 Bulls Head Passage
    - The Bunch of Grapes, 14 Lime Street
    - St Peter Upon Cornhill Church
    - St Michael Cornhill Church
    - Jamaica Buildings
    - St Edmund the King Church
    - St Clements Church
    - 9 Eastcheap
    - 11 Eastcheap
    - The Ship Tavern, 11 Talbot Court
    - 4 Brabant Court
    - 2 Philpot Lane
    - 5 Philpot Lane
    - St Margaret Pattens Church.

851. At all receptors identified and assessed for light spill pre-curfew, the levels of light trespass would be limited and would be well below the 25-lux threshold set out within the ILP Guidance and the CoL Lighting SPD.

852. The technical assessment also shows that post-curfew (after 11pm), the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for all of the buildings assessed and concludes a negligible impact and no significant effects.

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

854. Subject to the relevant lighting condition, the development would comply with the Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3, and has been designed as to avoid light spill.

Thermal Comfort Assessment

855. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

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

857. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and are used to define the categorization of a given location.

KEY	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% 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% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

858. Five configurations have been assessed, including;

- Configuration 1: Existing site with existing surrounds
- Configuration 2: Existing site with consented cumulative schemes
- Configuration 3: Proposed Development with existing surrounds
- Configuration 4: Proposed Development with consented cumulative schemes
- Configuration 5: Proposed Development with consented and non-consented cumulative schemes.

Baseline and Future Baseline (configurations 1 and 2)

859. In the existing baseline, conditions range between all-season to short-term seasonal, with the poorest comfort conditions experienced to the southeast and east of the Site on Fenchurch Street, Rood Lane and Lime Street. These lower comfort conditions are mostly attributed to wind chill in winter.

860. For entrances and bus stops in the existing baseline, all receptors tested meet the target conditions.

861. For surrounding amenity spaces (ground level seating), most receptors meet the comfort criteria in the existing baseline with the exception of the spill out seating on Lime Street which is one category less comfortable than the target.

862. Other amenity spaces (terraces), all tested receptors meet the target conditions.

863. In the future baseline, conditions are made generally more comfortable than the existing baseline, with the areas of short-term seasonal conditions to Fenchurch Street and Lime Street reduced in size.

864. However, in the future baseline scenario, conditions would be less comfortable to the northeast of the Site along Gracechurch Street.

865. Bus stops and entrances would continue to meet the target conditions in the future baseline. Ground level amenity spaces would all meet the comfort criteria, including the area on Lime Street which was one category less comfortable than the target in the existing baseline. All tested surrounding terraces would meet the target condition in this scenario, consistent with the existing baseline.

Proposed Development (existing surrounds)

866. Overall, the range of comfort levels achieved as a result of the Proposed Development with existing surrounds is the same as the existing baseline condition. However, there would be instances of less comfortable conditions in Gracechurch Street to the west of the Site, and to the southeast of the Site between Fenchurch Street and Lime Street.

867. On-site, all entrances would satisfy the target comfort conditions.

868. Most off-site entrances would achieve the target comfort conditions with the Proposed Development in situ with existing surrounds. However, there is one entrance on Lime Street which would experience short-term seasonal conditions, one category less comfortable than the target.

869. The off-site bus stops to Gracechurch Street would be suitable for short-term seasonal use which is one category less than the target. All other off-site bus stops would achieve the target conditions.

870. All off-site ground level amenity spaces would meet the target comfort criteria. There would also be an instance of betterment to the spill out seating area along Lime Street where, with the Proposed Development in situ, the area meets the target conditions where it did not in the baseline.

871. For terraces off-site, all would meet the target comfort conditions with the proposed development in situ. For the on-site terraces, the terraces at levels 6,28, 29 and 32 are suitable for their intended uses as they would meet the target comfort criteria. The terraces at levels 5 and 7, however, would achieve between one and two categories less comfortable than the target criteria.

Proposed Development (consented cumulative surrounds)

872. The range of conditions experienced with the Proposed Development with consented cumulative surrounds would be similar to the future baseline scenario, although the Proposed Development would reduce some conditions'

comfortability, particularly to Gracechurch Street west of the Site and to the southeast corner of the Site at Fenchurch Street/Lime Street junction.

873. On-site and off-site entrances, off-site bus stops, and off-site amenity spaces at ground level would meet the target comfort criteria.

874. On-site terraces at levels 6, 28, 29, and 32 would meet the target comfort criteria. However, on-site terraces at levels 5 and 7 would be one to two categories less comfortable than the criteria.

875. Off-site terraces would all meet the target comfort criteria, with the exception of the 88 Gracechurch Street roof terrace which would achieve between one and two categories less comfortable than the target. However, this is consistent with future baseline conditions so is not attributable to the Proposed Development.

Proposed Development (consented and non-consented cumulative surrounds)

876. This scenario includes the not yet consented schemes at 1 Undershaft and 60 Gracechurch Street in the above cumulative scenario, although it should be noted that these two schemes have both been given resolution to grant at the time of publication of this report.

877. The range of conditions experienced at off and on-site receptors would be of the same order as configuration 4 (Proposed Development with consented cumulative surrounds), with the exception of less calm conditions experienced on Fenchurch Street and Gracechurch Street, which is attributable to 60 Gracechurch Street.

878. All on-site entrances would achieve suitable comfort conditions in line with the target criteria.

879. Most off-site entrances would achieve suitable comfort conditions in line with the target criteria, with the exception of one on Lime Street which would be one category less comfortable than the target. This is also experienced in the proposed development versus existing surrounds scenario.

880. Surrounding bus stops off-site would mostly achieve the target condition. However, the bus stops to the western pavement of Gracechurch Street would be one category less comfortable than the target criteria. This is also experienced in the proposed development versus existing surrounds scenario.

881. All off-site ground level amenity spaces would meet the target conditions.

882. On-site terraces would achieve the same comfort conditions as in the Proposed Development versus existing surrounds and Proposed Development versus consented cumulative surrounds scenario, with the terraces at levels 5 and 7 proposed being one comfort category less than the target.

883. Off-site terraces would all meet the target comfort criteria, with the exception of the 88 Gracechurch Street roof terrace which would achieve between one and two categories less comfortable than the target. However, this is consistent with future baseline conditions so is not attributable to the Proposed Development.

884. The newly introduced roof terrace at 60 Gracechurch Street in this scenario would achieve conditions up to two categories less comfortable than the target criteria. These terraces face away from the Proposed Development so it is unlikely that these conditions are attributable to 70 Gracechurch Street.

Addendum to the ES

885. The thermal comfort assessment was updated as part of the Environmental Statement addendum (November 2024), given the removal of the expired consents at 55 Gracechurch Street and 130 Fenchurch Street. Configurations 2, 4 and 5 were re-tested with these two schemes removed from the configurations.

886. For configuration 2 (existing site with consented cumulative schemes), the removal of the two consented schemes would generally make conditions more comfortable in the locality.

887. For configuration 4 (Proposed Development with consented cumulative surrounds), the results are consistent with those originally submitted as part of the August 2024 Environmental Statement.

888. For configuration 5 (Proposed Development with consented and non-consented cumulative surrounds), the results are consistent with those originally submitted as part of the August 2024 Environmental Statement.

Thermal Comfort Conclusion

889. The application has suitably and sufficiently assessed the thermal comfort impact of the proposed development, in line with the City of London guidance.

890. Overall, the proposed development would make conditions less comfortable on Gracechurch Street to the west and on the junction of Lime street and Fenchurch street to the southeast. Although, overall comfort levels would not be fundamentally different from the baseline and Officers consider this is therefore acceptable. The inclusion of cumulative schemes would generally make conditions more comfortable around the site.

891. The proposed development would have an adverse impact on one entrance on Lime Street and the bus stops on the west of Gracechurch Street, but have a beneficial impact on spill-out seating along Lime Street.

892. Conditions within the Site at the majority of the proposed terraces are suitable for the intended uses, although the comfort levels on the level 5 and level 7 terraces would not satisfy the target conditions. This is due to raised wind speeds in these areas, and the conditions on the terraces could be further improved and mitigated through landscaping, which was not considered in the assessment. These mitigation measures would be secured through condition and S106 obligation.

893. Subject to condition, it is considered that the thermal comfort in and around the site would be acceptable and in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise and Vibration

894. Noise and vibration from the development, particularly during construction and late-night noise from the completed development, is a concern for some neighbouring residents raising objection to the scheme.

895. The development plan sets out a series of noise policies that need to be taken into consideration in the assessment of each case. This includes policy DM15.7 of the Local Plan, which relates to noise and light pollution. A summary of the main noise related points from policy DM15.7 are set out below:

- Developers will be required to consider the impact of their development on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as housing and quite open spaces;

- Any potential noise conflict between existing activities and new development should be minimised;
- Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development; and
- Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

896. Policy DM21.3 of the Local Plan further seeks to protect the amenity of existing residents by resisting uses that would cause undue noise disturbance and seeks to ensure that noise generating uses are sited away from residential uses where possible.

897. Policy DM3.5 of the Local Plan states that proposals for new night time entertainment related uses will only be permitted where it can be demonstrated

that, either individually or cumulatively, there is no unacceptable impact on the amenity of residents and other noise sensitive uses and environmental amenity, taking account of the potential noise, disturbance and odours arising for the operation of the premises, customers arriving at and leaving and the servicing of the premises. Applicants would be required to submit Management Statements detailing how these issues would be addressed during the operation of the premises.

898. The draft City Plan 2040 has policies relating to the prevention of noise pollution (policy HL3) and preventing noise disturbance from terraces and viewing galleries (policy DE4). Policy SA2 of the Plan sets out a requirement for major commercial development to provide a management plan setting out proposals for the dispersal of patrons and workers from premises to reduce instances of noise nuisance.

899. Policies D13 and D14 of the London Plan 2021 further seek to ensure that harmful noise impacts are mitigated.

900. The City of London Noise Strategy identifies the strategic approach to noise in the City in line with the Noise Policy Statement for England, and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development.

901. Chapter 7 of the Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic which could be attributed to the development, and the likely significant environmental effects of these matters.

902. The nearest noise sensitive receptors are as follows:

- The Swan Tavern
- 77-80 Gracechurch Street
- 20, 33, 60 and 81 Gracechurch Street
- 6-12, 20 and 158-159 Fenchurch Street
- 21 Lime Street
- 25 Lime Street
- The Bunch of Grapes, 14 and 15-18 Lime Street
- 2-4 Bulls Head Passage
- 4 Brabant Court.

903. The Proposed Development would feature retail at ground floor in the form of a market, office terraces at levels 5 and 7 and balconies at levels 28-31, and a public terrace at level 32. The public viewing terrace would be open from 10am-7pm.

904. In most City redevelopment schemes, the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies a Major Adverse (significant) impact to the Swan Tavern in terms of noise and vibration during structural demolition of the central core between level 4 and basement, and a moderate adverse (significant) impact during piling and construction of the superstructure to level 4. Otherwise, this receptor would experience negligible (not significant) impacts during demolition and construction.

905. 14 Lime Street would experience a moderate adverse (significant) impact during structural demolition of the central core between level 4 and basement. Otherwise, this receptor would experience negligible (not significant impacts) during demolition and construction.

906. All other receptors would experience a negligible-minor adverse (not significant) effect throughout demolition and construction.

907. Demolition and construction impacts would be temporary in nature. The ES acknowledges that the presented noise levels are a worst-case scenario, without any mitigation measures being applied. In practice, the development would be required to comply with the City's Code of Practice for Deconstruction and Construction Sites (9th Edition, January 2019), which sets out standards for how construction sites are to be maintained and operated with a view to limiting disturbance and disruption to neighbours and users of the surrounding area. A scheme of protective works for the development would be required by condition prior to any works commencing, setting out how noise, dust, and environmental effects of the works would be minimised.

908. The statement has identified that there would be no significant effects during the operational stage of the development, either from road traffic noise associated with the development itself, plant noise, or operational noise from the development including from entertainment noise emission from the use of internal and external spaces in the proposed development.

909. Information is not yet available regarding the type, number or exact location of the mechanical plant which could be installed in the completed development. Such information would be expected at detailed design stage. As a result, should planning permission be granted details of the type of plant, location of the plant, noise levels from the plant and details of plant mounting would be required by condition. The plant would need to comply with the City's standard of 10dba below background noise level. As such it is not considered that operational plant noise would give rise to any adverse or significant adverse effects.

910. The ES considers the effects of noise from delivery and servicing activities associated with the operation of the proposed development. The service yard is located to the east of the site, in the area of the proposed market, and would be operated overnight. This is located away from the majority of the noise sensitive receptors. Subject to a Delivery and Servicing Plan (DSP) to be secured through S106, it is anticipated that there would be no significant noise from delivering and servicing activities at the sensitive receptors. As such negligible impacts are expected from delivery and servicing noise and no significant effects are anticipated.

911. Technical consideration has been given to potential noise from the proposed market and public viewing terrace and any use of amplified music. The potential impact from these spaces has been assessed, and it is recommended that an Events Noise Management Plan be prepared and submitted by condition/S106 obligation.

912. The following conditions are recommended by the City's Environmental Health team to prevent undue operational noise from the site, noting that the Licensing Act 2003 should not be relied on to control noise:

- Ensure that no live or recorded music is played from the Site that is audible within any residential or other premises in nearby relevant buildings, which includes use of the external terrace areas; and

- That the office roof terraces are not used or accessed between the hours of 11pm on one day until 7am the following day and at no time on Saturdays, Sundays or Bank Holidays other than in the case of an emergency.

913. Policy 3.5 of the Local Plan and policy CV4 of the Draft City Plan 2040 refer to the provision of management plans for evening and nighttime uses. A clause within the S106 agreement would require a management plan is provided for the proposed viewing terrace, cultural uses and market, setting out information such as:

- Hours of operation;
- Noise mitigation plans both internal and external noise, including measures to reduce sound transfer, such a soundproofing, noise controls and double entry lobbies;
- The dispersal of patrons;
- Arrangements for the storage, handling and disposal of waste;
- Information on deliveries and servicing; and
- Measures to deal with odours and the location of ducts and plant.

914. In conclusion, the submitted ES considers the impact of the development on the noise environment and potential impacts of vibration. Subject to conditions

controlling noise levels from entertainment uses and plant equipment, hours of operation, and S106 clauses regarding the management of the premises, it is not considered that operational noise would adversely affect neighbours. Noise and vibration from construction and deconstruction has been identified as potentially having temporary significant effects on sensitive receptors. The developer would be required to mitigate the impact of the works and would need to provide a Scheme of Protective Works to demonstrate compliance with the City of London's Code of Practice for Deconstruction and Construction sites. A condition is recommended to ensure that any new plant would be 10dba below background noise level. Subject to conditions it is considered the proposals would comply with London Plan Policies D13 and D14, Local Plan 2015 Policies DM15.7, DM21.3 and DM3.5 and draft City Plan 2040 policies HL3, SA2 and DE5.

Air Quality

915. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts, and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

916. The application submission includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development. Air Quality was scoped out of the Environmental Statement. The Air Quality Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance 2023, and an Air Quality Positive Statement has been submitted with the application.

917. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

918. The proposed development would be car free save for the disabled parking bay, and the energy strategy including heating and hot water is all-electric. No combustion plant is proposed for the primary energy strategy, but there is an emergency-power diesel generator proposed, only routinely used for testing and maintenance, and the exhaust would be located 3.25m above roof level in

a good dispersion environment. The BREEAM Pre-assessment demonstrates that the scheme would achieve 'Excellent' in the pollution category. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

919. Measures that were considered during the design phase to have a positive impact on air quality include separating sensitive uses from pollution hotspots and a robust ventilation strategy, use of green infrastructure, minimising traffic generated, and utilising a low or zero emission energy strategy.

920. The City's Air Quality Officer has no objections to the proposals. Conditions are recommended in relation to the requirement for a revised Air Quality Positive Assessment to ensure that the proposed development maximises benefits to air quality, to Non-Road Mobile Machinery Register details, details of ventilation and extraction equipment specifically in relation to the market, and the requirement for a Local NO2 Monitoring Strategy as part of the Construction Environmental Management Plan.

921. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

Contaminated Land

922. Local Plan policy DM15.8 and draft policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

923. Policy S1 of the emerging City Plan expects developers to address land contamination. The application is accompanied by a Geotechnical and Geoenvironmental Desk Study prepared by Robert Bird Group, as a standalone technical document outside of the Environmental Statement.

924. There are nine accessible boreholes on and around the Site. During the construction of the existing 4-storey basement, most of the made ground identified was removed. There was a historical electricity sub-station located within the site boundary, which is a potential source of contamination, but this was likely removed when the building was last excavated in 2000. Off-site there were a number of railway uses within 50-250m of the site, with potential contaminants such as hydrocarbons from fuel and trains, historical tanks with potential to be fuel or water tanks that could leach into ground water. However,

the off-site potential contaminants are of low contamination risk given the distances from the Site, and the impermeable nature of the remaining near surface geology.

925. The unexploded bomb risk maps confirmed the Site is located in an area of moderate to high risk of Unexploded Ordnance (UXO), but given the extensive basement excavation in the 2000s, UXOs are considered low probability.

926. The applicant has identified that the site has a long history of occupation, including for commercial purposes since 1873. The current building dates from the early 2000s, and included a significant 4-storey basement excavation. The main potential contaminant has been identified as made ground, although it is thought that the majority of potentially contaminative made ground was removed as part of the 2000 basement excavation with some remaining made ground potential around the perimeter of the Site. The other potential contaminant is existing building plant, which is located at basement level 3. The plant is due to be replaced at second/third basement floor level, and there would be no additional excavation as the basement levels are being retained in situ with the exception of basement level 4 which is being infilled.

927. During the existing building's construction, no asbestos based products were incorporated and all existing building asbestos was removed from site. Therefore, the current existing building is believed to be entirely free of asbestos. There is the potential for asbestos to remain in the made ground that may be present around the perimeter of the Site.

928. The Site is not currently classified as contaminated land under Part 2A of the Environmental Protection Act 1990, nor has it been identified for further review under the CoL's Contaminated Land Strategy. There are no records of current or former landfills on Site. The assessment has considered the effect of made ground across the City.

929. The report confirms that there is low risk to future site users from potential contamination from made ground, noting the majority of the made ground was removed in the 2000's excavation. Given that no further excavation is proposed, the risk is negligible. Any potential contamination from the removal of existing plant can sufficiently mitigated against through safe working practices.

930. Conditions are recommended that requires a detailed site investigation to establish if the site is contaminated, followed by a remediation scheme to be submitted if any contamination is discovered that requires remediation. As part of any future investigation the work should also include groundwater and gas monitoring, and screening of samples for the presence of asbestos.

931. Overall, subject to condition the proposals are in accordance with policy DM15.8 of the Local Plan and policies S1 and HL4 of the emerging City Plan.

Health Impact Assessment

932. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

933. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that would ensure health impacts are positive, such as a Construction Environmental Management Plan and Cycling Promotion Plan.

934. There are a number of residential properties surrounding the development site. The HIA addresses potential disturbance from construction noise for the neighbouring sensitive receptors and states that the Construction Environmental Management Plan and Demolition and Construction Logistics Plans would enable mitigation of disturbance.

935. The HIA has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Promoting walking through clear and comfortable pedestrian routes and an enhanced public realm, and suitable inclusively accessible routes;
- Excellent cycle facilities which would encourage and support active transport by building users;
- Focus on pedestrian and cyclist safety through clear signage and wayfinding, active and passive surveillance across the Site, and a robust lighting strategy to allow for an enhanced feeling of security;
- The Site is well located with good links to a wider pedestrian, cycle and public transport network, promoting users to choose active modes of travel coming to and from the Proposed Development;
- The provision of improved public realm at grade which would facilitate easy movement between buildings and places by linking to and revitalising the existing streetscape, with a link to Leadenhall Market, improving the physical environment and contributing to social cohesion, including through integrated seating and green infrastructure that would encourage people to linger and promote an improved sense of wellbeing;

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Provision of significant greened areas and external terraces for future occupiers to promote access to nature and a sense of wellbeing;
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site;
- A car-free (except the disabled bay) development minimising vehicles travelling to the Site, encouraging active travel, and reducing emissions;
- Building design that has considered the context of the Site and site layout optimised through the co-location of commercial and community uses with enhanced public realm and public viewing gallery;
- The flexible market space, viewing galleries and terraces included in the Proposed Development are purpose-built for community use and are intended to promote social interaction through special events and programming.
- The proposed buildings would employ systems to reduce energy usage, and the Proposed Development targets a BREEAM Excellent rating; and
- Consideration to sustainability and inclusive design.

936. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Preparation and agreement of Construction Environmental Management Plan (CEMP)/Scheme of Protective Works to address any adverse amenity impacts arising from demolition and construction.

937. Potential temporary negative impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations contained within the S106 Agreement. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2040 policy S1.

Sustainability

Circular Economy

938. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1set out the City's support for circular economy principles.

939. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the

avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites.

940. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options.

941. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

942. The existing building, completed in 2001, was directly commissioned by the retailer Marks and Spencer and follows a department store format with office floorspace above. The building occupies the entire site footprint, sharing party walls with the Swan Tavern Public House and 21 Lime Street. The façade is a balance of Jura Limestone curtain walling and glazed panel cladding. The substructure consists of reinforced concrete raft slabs with a secant pile basement perimeter retaining wall. The use of no piles avoids the remaining archaeology and historic piles beneath. The steel framed superstructure is founded on the raft slab. There is no structural concrete core, the building is stabilised through steel-braced frames located at lifts and stairs. The column grid is typically 9mx7.5m, with a floor-to-floor height of 5m. The superstructure includes metal decking floor slabs with a steel frame.

Pre-redevelopment audit optioneering

943. The pre-redevelopment audit includes an options assessment that details how different development options would address circular economy, establish the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report. The options are also evaluated with regard to their opportunities for wider environmental sustainability benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.

944. The optioneering exercise undertaken for 70 Gracechurch Street includes 3 options:

- Option 1: Retrofit of the existing building, 100% retained substructure and superstructure; 28,056 sqm GIA

- Option 2: Retrofit plus 2 additional storeys, 100% retained substructure, 95% retained superstructure; 31,676 sqm GIA
- Option 3: Retrofit/partial demolition plus additional tower structure, 55% retained substructure, 45% retained superstructure; 77,633 sqm GIA; 33 storeys

945. The optioneering assessment demonstrates that options 1 and 2 maximise retention of the existing building fabric. However, option 3 provides opportunities for significant improvements to the public realm, including a new north-south public route to Leadenhall Market, and deliver a quantum of office space that would contribute to the City Corporation's target for additional office floorspace. Option 3 retains a significant proportion, maximises reuse of the existing basement and foundations, and delivers a 25-storey extension with major strengthening works. It includes full social and economic benefits on the site while significantly reducing impact on embodied carbon and construction waste. It was therefore recommended as the preferred option.

946. The pre-redevelopment audit highlights that any extension greater than two stories would exceed the structural capacity of the existing foundations and a major vertical extension would require extensive structural strengthening. A central area of each floor slab would be removed to enable the construction of a structural core, however a significant part of the structure and floor slabs between basement level three and the fourth floor would be retained. Due to the high floor-to-floor heights (approximately 5m) of the existing building, levels five and above are proposed to be demolished to enable an additional storey to be accommodated in the design. The setbacks from level five mean that a considerable proportion of the floorplate would need to be demolished for the core, and considerable temporary works would be required.

947. The explored options are considered to comply with the GLA's Circular Economy Statement Guidance. The evaluation of the carbon intensity of the options is discussed in the whole life-cycle carbon emissions section of this report.

Application Proposal:

948. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.

949. The proposed development would retain approximately 60% of the existing structure and substructure (by mass).

950. The pre-demolition audit forecasts that the development would generate approximately 18,498 tonnes of material. Of this, more than 99% has been identified as suitable for reuse and recycling:

Material	Estimate (tonnes)	Forecast recycling		Forecast Reuse		Embodied carbon (tC02e)
		Onsite	Offsite	Onsite	Offsite	
Concrete	15,243	15%	85%			1,880
Metals	2,300		43%	5%	52%	4,369
Timber	213		95%			89
Stone	349		75%	25%		31
Gypsum	201		100%			78
Glass	180		100%			274
Ceramic	12		100%			3
Total	**18,498**	**12%**	**80%**	**1%**	**6%**	**6,724**

951. The proposed development commits to meeting all mandatory GLA waste requirements. It has also established circular economy project commitments and further innovation opportunities that align with the GLA Circular Economy principles and Building Layers. The commitments and innovation opportunities will be further developed in detailed design, and will be monitored through each project stage. Commitments include:

- 55-60% reuse of the existing substructure by mass (maximising use of existing basement) and 30-35% reuse of the superstructure (reuse of the steel frame elements where possible)
- Reuse of the existing Jura limestone cladding as part of the new precast cladding (or potential re-use as roof paving or other paving)
- Limited Cat A installation
- Specification of high-quality materials to maximise durability/lifespan
- Scenario building for different floorplate arrangements for smaller tenancies
- Design in access for maintenance, replacement and repair of building components.

952. A total of 120 tonnes of structural steel extracted from the existing building have been assigned for use in the new construction. A condition is recommended to ensure that this material reuse opportunity is carried through design development.

953. Further innovation opportunities include:

- Prefabricated or modular façade elements, including offsite assembly opportunities

- Specifying MEP products if the provider can demonstrate a circular approach
- Development of a comprehensive maintenance and repair programme
- Development of a servicing strategy with projected climate scenarios to meet future occupant needs

954. Prior to commencing the soft strip, the following material reuse and recycling actions will be explored:

- Contacting suppliers regarding take back schemes (for raised access flooring, fines, FFE and building service equipment)
- Material exchange platforms options to list items for offsite reuse
- Research into innovative on-site reuse opportunities, and reuse of materials from other sites

955. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and post-completion update, to confirm that high aspirations can be achieved.

Operational energy strategy and carbon emissions

956. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 13% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline').

957. A passive design approach is adopted to achieve 6% 'Be Lean' savings beyond the Part L baseline. Glazing area locations and design is optimised to maximise natural daylight and minimise overheating. Automated blinds would help balance solar gains, daylight and occupant comfort. The passive design approach helps adapt the building to cope with anticipated increases to summertime temperatures. A decentralised ventilation system would help control and reduce energy consumption when

958. Further energy efficiency measures, such as the utilisation of smart sensors and controls to match user demand and minimise energy usage will be explored. These measures include Specific Fan Powers (SFPs), lifts, provision of variable flow systems and variable air volume.

959. There are currently no available or proposed district heating networks in the local area, however a future connection to a potential future heat network will be provided and this strategy may be revisited as the design develops and subject to local heat network development.

960. A system of Photovoltaic (PV) panels and heat pumps are proposed as Low and Zero Carbon (LZC) technology solutions. A potential area of 120sqm has been identified as space for 20 PV panels, which would generate a total of 8.24kWh of electricity annually, approximately 0.13% of the landlord electrical energy (based on a NABERS 5* rating scheme). The proposed heating and cooling plant is comprised of 2-pipe reversible air source heat pumps and air-cooled chilled. The heat pumps have been sized to meet the building space heating and domestic hot water demand for showers.

961. The proposed energy strategy demonstrates that the proposed tower would achieve a 13% reduction in regulated carbon emissions under Part L 2021. It does not meet the GLA's 35% target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. Due to the proposed building's mix of uses, form, arrangement and design being highly unique, the energy efficient design cannot be considered appropriately in the Building Regulations Part L methodology. In addition, limitations of the Part L methodology arise from comparing the building's performance with a notional building performance rather than basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

Energy Use Intensity (EUI)

962. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m2(GIA)/year and a space heating demand of 15 kWh/m2(GIA)/year (regulated). The estimated EUI from the offices of the proposed development is 27.1 kWh/m2/year and for the space heating demand 0.81 kWh/m2/year, the latter being low due to enhances performance targets.

963. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building.

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

BREEAM

965. The proposed development has been pre-assessed under BREEAM New Construction v6.1 - shell & core (office). The development is targeting an 'excellent' rating with a targeted weighted score of 87%. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Water, Pollution, Materials and Waste. Although the pre-assessment score exceeds the 85% threshold to achieve an 'outstanding' rating, preliminary energy modelling demonstrates that the development would only achieve 4 out of the mandatory 6 credits in the Energy category needed for an 'outstanding' rating. There is still an aspiration to achieve all 6 credits through detailed design adjustments.

966. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

967. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposal targets a minimum target of 5 stars (out of 6 possible) rating and a detailed Design for Performance assessment will be carried out through RIBA stages 3 and 4.

Whole life-cycle carbon emissions

968. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle

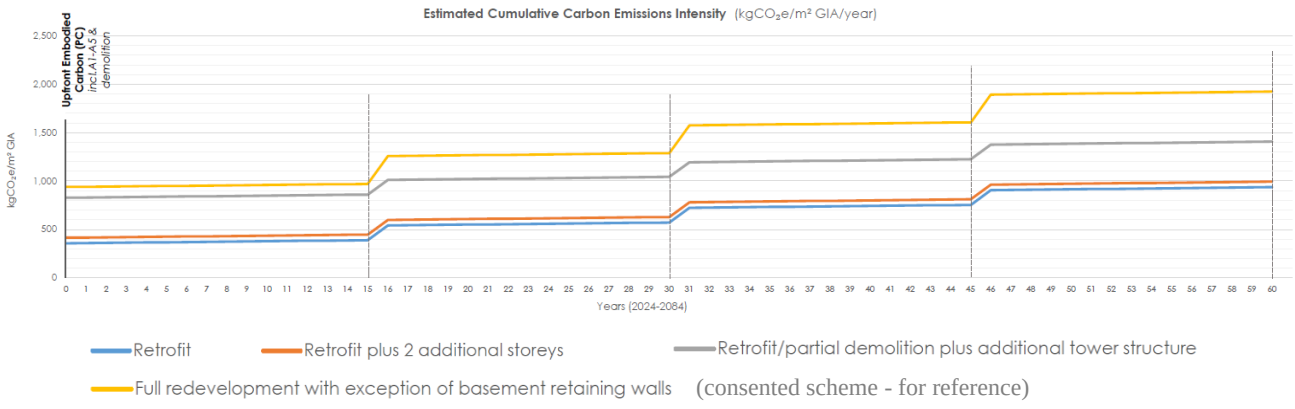
Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon options

969. Four options have been assessed with regard to their carbon impacts, environmental and wider planning benefits and constraints:

- Option 1: Retrofit of the existing building, 100% retained substructure and superstructure; 28,056 sqm GIA
- Option 2: Retrofit plus 2 additional storeys, 100% retained substructure, 95% retained superstructure; 31,676 sqm GIA
- Option 3: Retrofit/partial demolition plus additional tower structure, 55% retained substructure, 45% retained superstructure; 77,633 sqm GIA; 33 storeys
- An option 4, showing the whole life-cycle carbon impacts of the consented scheme, is shown in the graph below for reference only.

970. The following graph and table present the whole life-cycle carbon results from the options.







Option Reference	Option 1	Option 2	Option 3
	Retrofit	**Retrofit plus 2 additional storeys**	**Retrofit/partial demolition plus additional tower structure**
	Existing building to be retrofitted to modern day standards without any structural strengthening work, alongside change of use from department store to office. Public route through ground floor not provided.	Existing building to be retrofitted to modern day standards with a 2-storey extension and minor strengthening works, alongside change of use from department store to office. Total of 10 storeys.	Retention of as much of the existing building with a 25-storey extension and major strengthening works. Total of 33 storeys. Public route through ground floor provided.
Project reference period	60	60	60
Gross Internal area (GIA) m²	28,056	31,676	77,633
Net Internal area (NIA) m²	11,481	14,419	50,643
Change in NIA (compared to existing) m²	0	2,938	39,162
Substructure % retained by mass	100%	100%	55%
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	95%	40%
Total WLCA (incl. B6 & pre-demolition) ($kgCO_2e/m^2$ GIA) *Module B7 is not considered*	**936**	**993**	**1,406**
Upfront Embodied Carbon (A1-A5) excl. sequestration ($kgCO_2e/m^2$ GIA)	357	411	821
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7($kgCO_2e/m^2$ GIA)	450	450	450
Estimated Whole Building Operational Carbon for building life time (B6) ($kgCO_2e/m^2$ GIA)	129	129	129
Total WLCA (incl. B6 and pre-demolition) (tCO_2e) *Module B7 is not considered*	**26,256**	**31,452**	**109,186**
Total existing building demolition (tCO_2e)	0	98	469
Upfront Embodied carbon (A1-A5) (tCO_2e)	10,005	13,006	63,751
In-use embodied carbon (B-C) (tCO_2e)	12,626	14,255	34,935
Operational Carbon for building life time (B6) (tCO_2e)	3,625	4,093	10,031

Table: Whole life-cycle carbon options summary

971. The options can be analysed in terms of their carbon emissions, opportunities and constraints throughout the GLA's reference period of a 60 year life-cycle as follows:

972. Options 1 and 2 two provide modest interventions to the existing building without any major structural works. The retrofit and upgrade of the existing fabric would result in approx. 2/3 of the embodied carbon of option 3 (per square meter). There is a similar proportion of embodied carbon impact of the whole life-cycle carbon results per square meter due to the assumption that the retrofit would result in comparable operational carbon emissions across all options.

973. However, options 1 and 2 would not offer significant improvements for the public realm and connectivity in this busy part of the City, due to commercial constraints as office floorspace would need to be further reduced to achieve this. Similarly, opportunities for the integration of urban greening and biodiversity would be restricted. Given the pivotal location of the site in the Eastern Cluster, the transformation of the existing building to a development of the highest quality provides a vibrant mix of uses and publicly accessible spaces, a variety of external amenity spaces including urban greening and biodiversity would be limited by the constraints of the existing structure.

974. Options 3 and the consented full redevelopment would have similar opportunities to provide a holistic sustainability strategy. However, option 3 would retain and reuse significant percentages of the existing structure and would result in reduced embodied carbon impacts. While a retrofit with limited extension would be a feasible option, and as a lower level of extension in option 3 could deliver the same sustainability benefits with less embodied carbon impacts, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London, as set out elsewhere in the report. Overall, option 3 is considered to provide the best opportunities for a sustainable building design that benefits the vibrancy, connectivity, climate resilience and biodiversity of the local area and that contributes to futureproofing the City as a whole.

975. Option 3 therefore has been selected as to be developed for the application scheme.

976. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

977. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 and paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

Application Proposal:

978. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions, and the consideration of design options has determined the design to include:
    - Retention of existing substructure and elements of the existing superstructure
    - Design of a lightweight superstructure frame for the tower to minimise strengthening requirements of the foundations
    - Addition of piling and raft within existing basement volume
    - Use of 25% cement replacement product in concrete (GGBS – ground granulated blast furnace slag)
    - Optimisation of the façade design for embodied carbon and operational energy performance.

979. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development can achieve the GLA's Standard Benchmark. The measures listed below could contribute to achieving embodied carbon emissions that improve on the GLA standard benchmark, despite the challenges of a tall building structure. These will be considered during the detailed design stages and include:
    - Steel reuse from existing frame deconstruction
    - Low carbon concrete specification
    - Low carbon aluminium
    - Reuse of site deconstruction material, e.g. piling mat.

980. GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow this Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants used RICS Version 2 in accordance with RICS requirements, however, the calculations in compliance with Version 1 were provided in the 10 December 2024 addendum, in compliance with the requirements of the GLA guidance.

981. The table below shows baseline whole life-cycle carbon emissions per square meter for the building in relation to the GLA benchmarks for offices at planning application stage. The table reports calculations using RICS Version 1 methodology, as required in the GLA WLC Assessment Guidance. The Version 1 results shown in the table below in bold figures are compared with the GLA benchmarks in order to remain in compliance with the requirements of the GLA's WLC Assessment Guidance. It also reports calculations using RICS Version 2 methodology, for information only. RICS version 2 is an updated methodology that includes a 15% contingency and several new assumptions across specific life-cycle modules.

Scope	**Proposed development (RICS V1)**	Proposed development (RICS V2)	Benchmark	GLA benchmark
RICS components	**kgCO2/m2**	kgCO2/m2	kgCO2/m2	
A1-A5	**792**	851	< 950	GLA standard
			< 600	GLA aspirational
A-C (excluding B6-B7)	**1,293**	1,362	< 1,400	GLA standard
			<970	GLA aspirational
B6+B7	**1,171**	1,171		
A-C (including B6-B7)	**2,464**	2,533		

982. The WLC RICS Version 1 Assessment Spreadsheet, submitted in the December 2024 addendum, calculates that the proposed development would result in 197,562,183 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 93,856,808kg CO2e (48% of the building's whole life-cycle carbon), and the

embodied carbon emissions for 103,705,375kg CO2e (52% of the building's whole life-cycle carbon).

983. The WLC RICS Version 2 Assessment Spreadsheet, submitted in the July 2024 planning submission, calculates that the proposed development would result in 203,090,932 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 93,856,808 kg CO2e (46% of the building's whole life-cycle carbon), and the embodied carbon emissions for 109,234,124 kg CO2e (54% of the building's whole life-cycle carbon).

984. A detailed whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.

985. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

Climate Resilience

986. Buildings that are being planned now will be subject to more extreme climate conditions during their lifetime than we current experience. London Plan Policy GG6 requires development to "ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect". Local Plan policy DM15.5 (Climate change resilience and adaptation) supports these outcomes.

987. In section 4.2.4 'Climate Change Resilience and Adaptation' of the submitted Sustainability Statement it is stated that a site-specific review of vulnerability to climate change has been carried out in line with the BREEAM Wst 05 credit. The report states that the analysis suggested that the design parameters already cover the project climate change scenarios that are applicable to the project. The analysis did identify the potential increased risk of overheating due to climate change. The applicant should provide a copy of the BREEAM Wst

05 assessment within their Climate Change Resilience and Sustainability Statement (CCRSS).

Overheating

988. An overheating assessment followed CIBSE TM52 modelling has been undertaken for the building. The assessment indicated that in configuration 5 (proposed development, consented and non-consented cumulative schemes) some bus stops and amenity spaces were assessed to be in comfort categories which are less than the comfortable target condition.

989. Design measures that are proposed to limit overheating are:

- Passive design measures such as orientation, shading, high albedo materials, fenestration, insultation and green infrastructure provision.
- Manage heat within the building through exposed internal thermal mass and high ceilings.
- Internal heat generated will be minimised through energy efficient design for lights, pipework, fans and pumps.
- Local mechanical ventilation plant provided on each floor to ensure flexible operation and control, reducing fresh-air cooling requirements.
- Façade incorporates low u-values and g-values to limit solar gains.

990. The submission documents relating to overheating do not provide a sufficient level of detail on how the development is addressing the urban heat island effect which is a core element of the CR1 Overheating and Urban Heat Island (UHI) policy. The quantified information for the design measures listed above would be included within the CCRSS via condition.

Flooding

991. The Flood Risk Assessment assessed the site to be at low to negligible risk of flooding from all sources.

992. The proposed drainage system comprises three blue/green roofs and an attenuation tank, and a rainwater harvesting for green roof irrigation is also included.

993. The proposed drainage system would restrict discharge rates to 3 l/s which would provide a 98% betterment on existing 1 in 100 year rates.

994. Based on the information provided in the submission documents, the proposed development is compliant with Policy CR2 Flood Risk.

Water stress

995. The proposed development is targeting 4 out of 5 BREEAM Wat 01 credits. Low flow sanitary fittings have been selected, and grey water and rainwater harvesting are included.

996. Further details and quantified values would be submitted via condition in the CCRSS on the fittings that have been selected to reduce the proposed development's impact on water supplies.

Biodiversity

997. The proposed development would create an uplift of approximately 2.14 biodiversity units per Ha, which does not meet the City of London's draft policy of 3 units per hectare.

998. Greening would provided through planting, green roofing and green walls. The submitted Landscape Strategy states that a mixed strategy of native and cultivars have been selected. The native species have been selected to tolerate the high wind speeds that are expected for their planting locations.

999. Further details would be provided in the CCRSS via condition on the species of plants that have been selected for their climate resilient qualities. The impact of biodiversity losses could be further reduced within the proposed development by:

- Areas of biodiverse green/brown roof should be allowed to colonise 'naturally', evidence suggests that these plants will be more stress resistant. Whilst some seeding would take place management should not focus on removal or management of plants that colonise. Unless these are deemed to be invasive or have significant structural or ecological implications;

- Varied substrates are highly recommended on green roofs and should be further complimented with a range of substrates including sands, gravels and rocky piles;

- Nest and roost box specifications should consider open face nest boxes for black redstarts and where integrated follow BS 42021 and specify only 'swift bricks';

- Invertebrate measures can also include rocky piles, sandy loam earth mounds and standing water. These would all provide a range of niches for invertebrate lifecycles and reproduction.

Pests and Diseases

1000. No reference or assessment has been made for the risk that pests and diseases as a result of climate change pose to the proposed development. This

should be considered in the context of the green infrastructure and the potential establishment of invasive non-native species (INNS). Infectious and climate sensitive diseases should also be mitigated within the interior systems of the building, specifically through ventilation measures, thermal regulation and water supply management. These details would be secured in the CCRSS via condition.

Food, trade and infrastructure

1001. The submitted Sustainability Statement notes that active travel opportunities have been met through the provision of 1,006 cycle parking spaces and end of trip facilities.

1002. When the CCRSS is prepared the following opportunities for food, trade and infrastructure should be considered as potential mitigation measures:

- Onsite facilities
- Are parts of the site publicly accessibly i.e. retail or cultural offerings.
- Facilities that provide food have sufficient storage space to manage demand,
- Opportunities for onsite food production (not bee hives).
- Sustainably supply
- Use of off-site consolidation services.
- Accommodation for cargo bike provision.
- Local Area Energy Plan
- Building connects to Citigen or other district heat network.
- Buildings make provision for future connection to heating and cooling networks.
- Onsite solar generation.
- Onsite emergency back-up electrical generation.

Conclusion on Sustainability

1003. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

1004. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1005. Compared to the assessed retrofit options with very limited extension potential, the proposed scheme retaining 60% of the existing structure and inserting a tall building into the site would ensure that a holistic sustainability strategy can be implemented, with benefits relating to improving the public realm around and across the site, incorporating a diverse mix of uses with public access to the roof top and integrating urban greening and climate resilience measures. A lower tower option might be able to deliver the same sustainability benefits with less absolute carbon impacts - however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.

1006. The energy strategy has been optimised for the site, targeting a challenging NABERS UK rating of 5 stars and a BREEAM “excellent” rating, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining 60% of the existing structure (by mass), as well as designing for longevity, adaptability and low maintenance. The proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. In addition to this, the proposed building form, design and use are highly unique and cannot be appropriately reflected in the calculations of the Part L methodology. However, offset payments will be made to mitigate the shortfall to reach the net zero carbon target. The proposed development therefore is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1007. London Plan Policy D11 (‘Safety, security and resilience to emergency’) states that 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.

1008. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

1009. Emerging Strategic Policy S2 of the draft City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, stakeholders to ensure that it is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism by ensuring that that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

1010. The security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the Architectural Liaison Office and Counter Terrorism Security Advisers within the City of London Police at pre-application stage.

1011. The main office, cultural space and retail entrances would be freely accessible during working and opening hours. Outside of these hours, these access points would be locked and monitored via an access controls system. Entrances and the new public realm would be under video and natural surveillance, both externally and internally, with proposed lighting considered to be adequate to support CCTV. Both the long stay and short cycle stay cycle storage would be under constant video surveillance, and additional security would be situated within the basement cycle facilities to ensure efficient and effective security management of the area.

1012. The site would be protected by integrated upstands within the perimeter of the building as well as two bollards at each end of the new public passage. There would be further bollards surrounding the servicing/market space within the site at ground level, with remotely controlled rising bollards to provide access to servicing vehicles. Further details of these protective measures would be required through condition and the Public Realm and Marketplace Management Plan secured in the S106 agreement.

1013. Security lines would be situated within the building, providing restricted access to all staff, tenants, visitors and contractors of the building. Turnstiles would be located on ground floor level to allow controlled access to occupiers.

Visitors to the public roof areas would need to go through a security screening. Further measures would be in place past the ground floor in the form of destination control lifts, and there would be a video surveillance system in place both internally and externally around the site for added security observation and the use of access control systems. All security measures would be controlled from the security control room located within the building, ensuring complete management of all security measures in place, during the buildings operating hours and outside of these hours.

1014. The building would have the ability to 'lock down' using physical measures in the event of an external threat, ensuring people do not enter dangerous areas and any threats are prevented from entering the building.

1015. Further details of the overall security strategy would be required by condition and through a S106 obligation, which would detail more specifically the measures to protect the building and its different user groups.

1016. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan policy D11, Local Plan Policy DM3.2 and the emerging City Plan strategic policy S2.

Suicide Prevention

1017. The City Corporation has an approved guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.

1018. Policy DE4 of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.

1019. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1020. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:

(A) Any stairs, ramps, floors and balconies and any roof to which people have access; and

(B) any lightwell, basement area or similar sunken area connected to a building;

Shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1021. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.

1022. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance.

1023. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.

1024. Regarding the proposals, there would be external terraces at levels 5-7 (podium level) and levels 28 to 31 for office workers, and a publicly accessible terrace at level 32. These terraces could represent a potential risk to individuals attempting suicide from the building. A combination of physical barriers, planting, staff training and surveillance are proposed to maximise the

effectiveness of preventative measures, including measures that increase the potential for human intervention.

1025. Access to the external terraces (levels 5-7, 28-31) would be for building occupants only and not the general public. A 1.7m tall screen would be located at these terraces to prevent any risk of terrace users from climbing over. The screens on the publicly accessible terrace would have a parapet height of 3.0m. Suitable species of planting would help to discourage movement to the perimeter of the building, and further measures would be in place such as suitable lighting and CCTV.

1026. Details of suicide prevention measures alongside an associated risk assessment would be secured by condition.

Fire Statement

1027. London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility.

1028. A Fire Statement, prepared by Arup and dated July 2024, was submitted with this application, in line with London Plan Policy D12 B for major developments. The statement outlines a comprehensive fire safety strategy for the building, which includes a phased evacuation strategy supported by a Category L3 automatic fire detection system and a voice alarm system. The building would be equipped with two independent firefighting shafts, each with a dedicated firefighting stair, evacuation lifts, wet risers, and mechanical smoke extraction systems. Sprinkler protection would be provided throughout the building, and all floors would be provided as compartment floors with 120-minute fire resistance. The building façade has been designed to prevent external fire spread, incorporating non-combustible materials where necessary, particularly near site boundaries.

1029. For persons with reduced mobility, the design includes protected refuges at each level above and below ground, outside of the flow of occupants evacuating the building. Each refuge would be equipped with two-way emergency voice communication systems. Dedicated evacuation lifts would serve all levels except for plant areas, ensuring equitable means of escape. A tailored Personal Emergency Evacuation Plan (PEEP) would be prepared by building management for each person using the building who may not be able to escape in a timely manner unaided. Details of inclusive emergency procedures would be requested under the Inclusive Access Management Plan to ensure escape routes and staff training has been considered for disabled people including where there is not a separate firefighting and evacuation lift.

1030. The fire strategy incorporates provisions for ongoing safety, with measures to ensure that any future modifications to the building would not compromise its fire safety design. A Responsible Person would be appointed under the Regulatory Reform (Fire Safety) Order 2005 who would oversee compliance with fire safety requirements during the operational phase of the development.

1031. The City's District Surveyor has reviewed the Fire Statement and raised no objection, confirming that the proposal complies with London Plan Policies D5 and D12. A condition would ensure the development is undertaken in accordance with the approved Fire Statement. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

1032. The City, as a public authority must, in exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1033. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of an enhanced and step-free public realm and a blue badge parking space on site. Officers also consider that the provision of accessible floorspace, and publicly accessible garden, learning space would advance equality of opportunity.

1034. The proposed development would not result in an adverse impact on the ability to use the surrounding churches as places of worship and religious observance. As such, there would be no impact on those who share a protected characteristic relating to religious beliefs and practices.

Human Rights Act 1998

1035. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).

1036. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme, and therefore necessary in the interests of the economic well-being of the country. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policies DM10.7 and DM15.7 and emerging City Plan 2040 Policies DE7, HS3 and HL3.

1037. Insofar as the grant of planning permission would result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

CIL and Planning Obligations

1038. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1039. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1040. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

1041. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	**Contribution (excl. indexation)**	**Forwarded to the Mayor**	**City's charge for administration and monitoring**
MCIL2 payable	£9,223,227.34	£8,854,298.25	£368,929.09

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£3,908,100.00	£3,712,695.00	£195,405.00
City Planning Obligations			
Affordable Housing	£2,605,400.00	£2,579,346.00	£26,054.00
Local, Training, Skills and Job Brokerage	£1,563,240.00	£1,547,607.60	£15,632.40
Carbon Reduction Shortfall (*as designed*) *Not indexed*	£600,344.00	£600,334.00	£0
Section 278 (Evaluation and Design Fee) *Not indexed*	£100,000.00	£100,000.00	£0
Security Measures Contribution (Eastern City Cluster)	£521,080.00	£515,869.20	£5,210.80
S106 Monitoring Charge	£5,750.00	£0	£5,750.00
Total liability in accordance with the City of London's policies	**£9,303,914.00**	**£9,055,861.80**	**£248,052.20**

City's Planning Obligations

1042. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- 'Be Seen' Energy Performance Monitoring
- Accessible Car Parking Space Management Plan
- Carbon Offsetting Document Submissions
- Changing Places Toilet Management Plan
- Construction Monitoring Contribution (£53,820 for First Year and £46,460 for Subsequent Years)
- TfL Cycle Hire and Improvement Contribution (£100,000.00 Indexed)
- Travel Plan (incorporating Cycle Promotion Plan)
- Delivery and Servicing Management Plan (including consolidation)
- Highway Reparation and other Highways Obligations
- Local Procurement Strategy

- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Provision of Affordable Workspace (First Floor) and associated Affordable Workspace Management Plan
- Provision of the Cultural Space at Basement Level, Cultural Implementation and Management Plan incorporating Digital Wall Management Plan (including curation, maintenance, hours of Digital Wall use and cultural content)
- Provision of the Digital Wall
- Provision of the free Public Viewing Gallery and accompanying Access, Operation, Lift Maintenance & Management Plan
- Provision of the Public Realm, Marketplace and accompanying Public Realm and Marketplace Management Plan
- Provision of the Public Route and accompanying Public Route Management Plan
- Section 278 Agreement and Section 38 Agreement (CoL)
- A10 Transport for London Road Network (TLRN) improvement scheme contribution (£450,000 BCIS index linked) or the completion of an Section 278 Agreement with TfL, which may include but is not limited to:
  - Making permanent of the current buildout on Gracechurch Street, currently in place with temporary materials
  - Carriageway resurfacing
  - Reconstruction/reinstatement of footways and associated works
- Television Interference Survey
- Utility Connection
- Wind Audit
- Solar Glare Assessment

1043. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement and accompanying feasibility study.

1044. The scope of the s278 agreement may include, but is not limited to:

<u>Fenchurch Street</u>

- Widening of the footways fronting the site
- Carriageway resurfacing
- Improvements to highways drainage within the frontage of the site
- Provision of road markings and associated traffic orders

<u>Lime Street</u>

- Introduction of vehicular access within Lime Street and necessary accommodation works and removal of the existing access

- Realignment of the Lime Street carriageway crossing improvements at the junctions of Fenchurch Street (materials to match the public realm vision for the area), Philpot Lane and Lime Street
  - To consider the signalisation of this junction, as it was the case with the previously agreed Section 106 agreement where it refers to the TA as preferred option
- The study to consider all options to facilitate the pedestrian movements, for example: introducing a zebra crossing, unsignalized crossing with refuge island, informal crossing with raised table, including the option to signalize this junction to allow a pedestrian phase. If signalisation is the option selected due to proximity with the existing junction Gracechurch/Fenchurch Street, linking the two junctions is likely to be required. Crossing improvements at the junctions of Fenchurch Street, Philpot Lane and Lime Street to be implemented by the applicant (in accordance with City of London procedure) following the outcome of the feasibility study.
- removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route

Philpot Lane

- Footway improvement works and associated works
- Carriageway resurfacing
- Highways Drainage
- Provision of road markings and associated traffic orders

Monitoring and Administrative Costs

1045. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1046. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusion

1047. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

1048. Two objections have been received from nearby residents relating to the impact of the development on nearby designated heritage assets, and the impact on

the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

1049. The proposed development comprises the structural retention and facade replacement of an unremarkable and outmoded retail and office development, alongside the delivery of a high quality, office-led tall building in the emerging City Cluster, which would contribute significantly to the office floorspace demand of the City, growing and changing business accommodation needs, whilst supporting and strengthening opportunities for continued collaboration and clustering of businesses, as well as, delivering high quality public realm and a visitor destination to drive footfall, vibrancy and activity on evenings and weekends.

1050. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure, and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver 4.86% of the entire City Plan target of the required commercial space to meet projected economic and employment growth demand. Over 78,000 sq.m of Class E commercial floorspace, which would be flexible, sustainable and best-in-class Grade A office floorspace, suitable for an additional circa 3345 City workers would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, including SME's.

1051. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission. The wind microclimate impact of the development has been thoroughly assessed and the assessment concludes that conditions would suitable for the intended uses in the proposed and cumulative scenarios, and there would be no unacceptable wind impacts at street level. All on-site receptors would be suitable for their intended uses.

1052. The building would be high sustainable, propose an increase in local greening and ecological value, would be energy efficient, targeting BREEAM 'Excellent' and adopting Circular Economy Principles by retaining 60% of the existing structure and integrated urban greening.

1053. The proposed development makes optimal use of the site and would be an efficient use of land, providing an attractive, elegant and refined City tower set on top of robust podium. The delivery of high-quality office floorspace would be in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals service centre.

1054. The scheme would deliver significant public realm enhancement, including a generously proportioned north-south passageway through the site, connecting Fenchurch Street to the network of passageways and lanes connecting to Leadenhall Market. Further public realm enhancements would be created to the southeast fronting Fenchurch Street and Lime Street, creating a large permeable publicly accessible space within the site and delivering highways and public realm improvements on Fenchurch Street.

1055. In transportation terms the proposal would provide significant betterment of the local public realm and highway through an aspirational scope of works, secured through S278 Agreement, meeting the aspirations set out in the City's Transport Strategy. 1,106 long term cycle parking spaces would be provided with associated shower and locker facilities, and 65 short stay spaces would be provided. The scheme has been designed to encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated via the proposed pedestrian network. Servicing and delivery trips can be accommodated within an on-site loading bay, with all vehicles being able to access and egress in forward gear, and with sufficient consolidation to be secured through a delivery and servicing management plan. In respect of demolition and construction traffic, deconstruction and construction logistics plans would be required by condition.

1056. The proposals would bring a quiet architectural charisma to the western edge of the Cluster, being a sensitive and sustainable exemplar of tower design. It would optimise the use of land, delivering strategic uplift in high quality office space, and publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, DM10.3, DM10.4, DM10.8, emerging City Plan 2040 policies S8, DE1, DE2, DE3, DE4, London Plan D3, D4, D5 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

1057. The proposal would deliver a tall building on a suitable site in the Eastern Cluster/emerging City Cluster in accordance with Local Plan Policy CS14 and CS7, emerging City Plan 2040 Policies S12 and S21, London Plan Policy D9.

1058. The proposal would not harm and would preserve al relevant pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13, emerging City Plan 2040 Policy S13 and London Plan Policy HC2, HC3 andHC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. In consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace). Following rigorous assessment, it is concluded that the proposal would preserve the Outstanding Universal Value and significance, authenticity and integrity of the Tower of London World Heritage Site, according with the aforementioned policies and associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

1059. The proposal would preserve the settings and significance of all designated heritage assets assessed, in accordance with Local Plan policies CS12, DM12.1, emerging City Plan policies S13 and HE1 and London Plan policy HC1, and would, subject to conditions, preserve archaeology in accordance with DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

1060. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.

1061. The proposals conflict with policies which seek to prevent the loss of retail floorspace in Principal Shopping Centres. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as the policies relating to tall buildings, heritage, design, and public realm are also complied with, that notwithstanding the conflict with the retail policies, the proposals comply with the development plan when considered as a whole.

1062. The proposed development would provide benefits through CIL (of approximately £3,908,100.00 million) for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

1063. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

1064. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals make would make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, Eastern/City Cluster, and public realm policies.

1065. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1066. It is the view of officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Consultation Responses:

Objection, Mr Will Ryan, 30 August 2024
Objection, Peter Rose, 29 September 2024

Consultee Responses:

Internal Consultations:

Memo, Contract and Drainage Service, 30 August 2024
Memo, District Surveyors Office, 06 September 2024
Memo, Lead Local Flood Authority, 12 September 2024
Memo, Environmental Health Officer, 22 November 2024
Memo, Air Quality Officer, 16 January 2025

External Consultations:

Letter, Historic England, 07 June 2024
Email, Health and Safety Executive, 29 August 2024

Email, Heathrow Airport, 29 August 2024
Letter, TfL Crossrail Safeguarding, 30 August 2024
Letter, London City Airport, 04 September 2024
Letter, Environment Agency, 13 September 2024
Letter, Historic England, 17 September 2024
Letter, Historic England, 18 September 2024
Letter, Royal Borough of Kensington and Chelsea, 18 September 2024
Email, TfL LU/DLR Infrastructure Protection, 19 September 2024
Letter, Natural England, 19 September 2024
Email, Thames Water, 20 September 2024
Letter, Thames Water, 20 September 2024
Letter, LB Lambeth, 23 September 2024
Letter, Surveyor to the Fabric of St. Paul's, 23 September 2024
Letter, LB Hammersmith and Fulham, 25 September 2024
Letter, TfL Crossrail Safeguarding, 30 September 2024
Letter, LB Tower Hamlets, 01 October 2024
Letter, Royal Borough of Greenwich, 01 October 2024
Letter, LB Southwark, 11 November 2024
Email, LB Wandsworth, 08 January 2025
Email, Health and Safety Executive, 09 January 2025
Email, Thames Water, 09 January 2025
Letter, London City Airport, 09 January 2025
Email, NATS Safeguarding, 09 January 2025
Email, Heathrow Airport, 10 January 2025
Letter, TfL Crossrail Safeguarding, 10 January 2025
Email, Historic England, 14 January 2025
Email, TfL LU/DLR Infrastructure Protection, 14 January 2025
Email, Port of London Authority, 16 January 2025
Email, Environment Agency, 21 January 2025
Email, LB Lambeth, 22 January 2025
Email, Historic England, 23 January 2025
Email, Historic England, 23 January 2025

Application Documents:

- Completed Planning Application Form, prepared by DP9;
- CIL Form, prepared by DP9;
- Covering Letter, prepared by DP9, dated 31 July 2024;
- Site Location Plan, prepared by
- Site Plan, prepared by
- Drawing Schedule, prepared by KPF
- Planning Statement, including Draft Heads of Terms for Legal Agreement, prepared by DP9;
- Design and Access Statement, prepared by KPF; including:
  - Accessibility Statement, prepared by Arup
  - Lighting Statement, prepared by EQ2 Lighting Consultants
  - Security and Hostile Vehicle Mitigation Strategy, prepared by Arup
- Aviation Safeguarding Report, prepared by KL Grant Consulting
- Biodiversity Net Gain Report (and BNG Plan), prepared by TMA
- Circular Economy Statement, prepared by Arup
- Cultural Plan, prepared by Hatch

- Social Value Strategy, prepared by Hatch
- Draft Construction Environmental Management Plan, prepared by Mace
- Outline Drainage Strategy, prepared by Robert Bird Group
- Ecological Appraisal, prepared by TMA
- Energy Statement, prepared by Arup
- Equalities Impact Assessment, prepared by Trium
- Flood Risk Assessment and Drainage Strategy, prepared by Robert Bird Group
- Fire Statement (and Fire Engineering Statement), prepared by Arup
- Framework Travel Plan, prepared by Momentum Transport Consultants
- Landscape Statement and Public Realm Management Plan, prepared by Latz und Partner
- Preliminary Ecology Appraisal, prepared by TMA
- Statement of Community Involvement, prepared by London Communications Agency
- Sustainability Statement, (including BREEAM Pre-Assessment), prepared by Arup
- Thermal Comfort Study, prepared by Gordon Ingram Associates
- Transport Assessment, prepared by Momentum Transport Consultants
- Utilities Statement, prepared by Arup
- Whole Life Carbon Assessment, prepared by Arup
- Environmental Statement, prepared by Trium Environmental; including:
    - Volume 1 – Main Assessment
    - Volume 2 – Townscape, Heritage and Visual Impact Assessment
    - Volume 3 – Technical Appendices
    - Volume 4 – Non-Technical Summary
- Environmental Statement Addendum, prepared by Trium Environmental
- Design and Access Statement Addendum, prepared by KPF
- Inclusive Access Addendum, prepared by Arup
- Thermal Comfort Study Addendum, prepared by GIA
- Supplementary Model Views, prepared by Millerhare
- ES Volume 3: Appendix C: Wind and Microclimate CFD Report

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, archaeology, noise & vibration, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual impact, climate change, greenhouse gas emissions, and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the likely significant effects caused by a number of cumulative developments added into and taken out of the study context since the submission of the original ES. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and cultural uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide (all figures GIA excluding plant):

- Office (Class E(g)(i)) – 78,711sq.m
- Retail/Food and Beverage (City Market) (Class E (a/b)) – 195sq.m
- Cultural Space/Public Viewing Gallery (Sui Generis) – 1,273sq.m

REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

3. The areas within the development marked as Cultural/Public Viewing Gallery on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11.

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other

measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

Appendix B

Relevant London Plan Policies.

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- All London Green Grid SPG (March 2012);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Sustainable Design and Construction SPG (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- London World Heritage Sites SPG (March 2012);
- Social Infrastructure SPG (May 2015);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

Relevant Draft City Plan 2040 Policies

S1 Healthy and inclusive city
HL1 Inclusive buildings and spaces HL2 Air quality
HL3 Noise
HL4 Contaminated land and water quality
HL6 Public toilets
HL9 Health Impact Assessment (HIA)
S2 Safe and Secure City
SA1 Publicly Accessible Locations
SA2 Dispersal Routes
SA3 Designing in Security
HS3 Residential environment S4 Offices
OF1 Office development
S5 Retail and Active Frontages
RE2 Active Frontages
RE3 Specialist Retail Uses and Clusters
RE4 Markets
S6 Culture and Visitors
CV2 Provision of Arts, Culture and Leisure Facilities

CV6 Public Art
S7 Smart Infrastructure and Utilities
IN1 Infrastructure Provision and Connection
IN2 Infrastructure Capacity
S8 Design
DE1 Sustainable Design
DE2 Design Quality
DE3 Public Realm
DE4 Terraces and Elevated Public Spaces
DE5 Shopfronts
DE7 Daylight and Sunlight
DE8 Lighting
S9 Transport and Servicing
VT1 The impacts of development on transport
VT2 Freight and Servicing
VT3 Vehicle Parking
S10 Active travel and Healthy Streets
AT1 Pedestrian Movement, Permeability and Wayfinding
AT2 Active Travel including Cycling
AT3 Cycle Parking
S11 Historic Environment
HE1 Managing Change to the Historic Environment
HE2 Ancient Monuments and Archaeology
HE3 Setting of the Tower of London World Heritage
Site S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Space
OS2 City Urban Greening
OS3 Biodiversity
OS4 Biodiversity Net Gain
OS5 Trees
S15 Climate Resilience and Flood Risk
CR1 Overheating and Urban Heat Island
Effect
CR2 Flood Risk
CR3 Sustainable drainage systems (SuDS)
S16 Circular Economy and Waste
CE1 Sustainable Waste Facilities and
Transport
S21 City Cluster Key Area of Change
S26 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines 2020

- Wind Microclimate Guidelines, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD, July 2016
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;
c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

a) conducting a full risk assessment;
b) keeping access points to the development to a minimum;
c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
d) ensuring early consultation with the City of London Police on risk mitigation measures;
e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
c) appropriate, high quality and durable materials are used;
d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;
l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
b) ensuring that financial provision is made for the future maintenance of new public art;
c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;

b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;
b) building design which minimises wastage and makes use of recycled materials;
c) recycling of deconstruction waste for reuse on site where feasible;
d) transport of waste and construction materials by rail or river wherever practicable;
e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
b) the benefits of the development outweigh the flood risk to future occupants;
c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and
b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

a) green roofs and walls, soft landscaping and trees;
b) features for wildlife, such as nesting boxes and beehives;
c) a planting mix which encourages biodiversity;
d) planting which will be resilient to a range of climate conditions;
e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

DM20.1 Principal shopping centres

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
b) the contribution the unit makes to the function and character of the PSC;

c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Appendix C

Methodology for daylight (including radiance), sunlight and overshadowing assessment

Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.

Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022).

Policy DE8: 'Daylight and sunlight' of the Draft City Plan 2036 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight.

Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations.

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

Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact to student residential should be considered.

Methods of Assessment

Daylight to Existing Buildings

The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

1. Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the

loss would be noticeable.

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

The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and

- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and

- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an

existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Radiance Assessment

A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

Whilst student accommodation is not explicitly discussed within the BRE Guidelines, it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

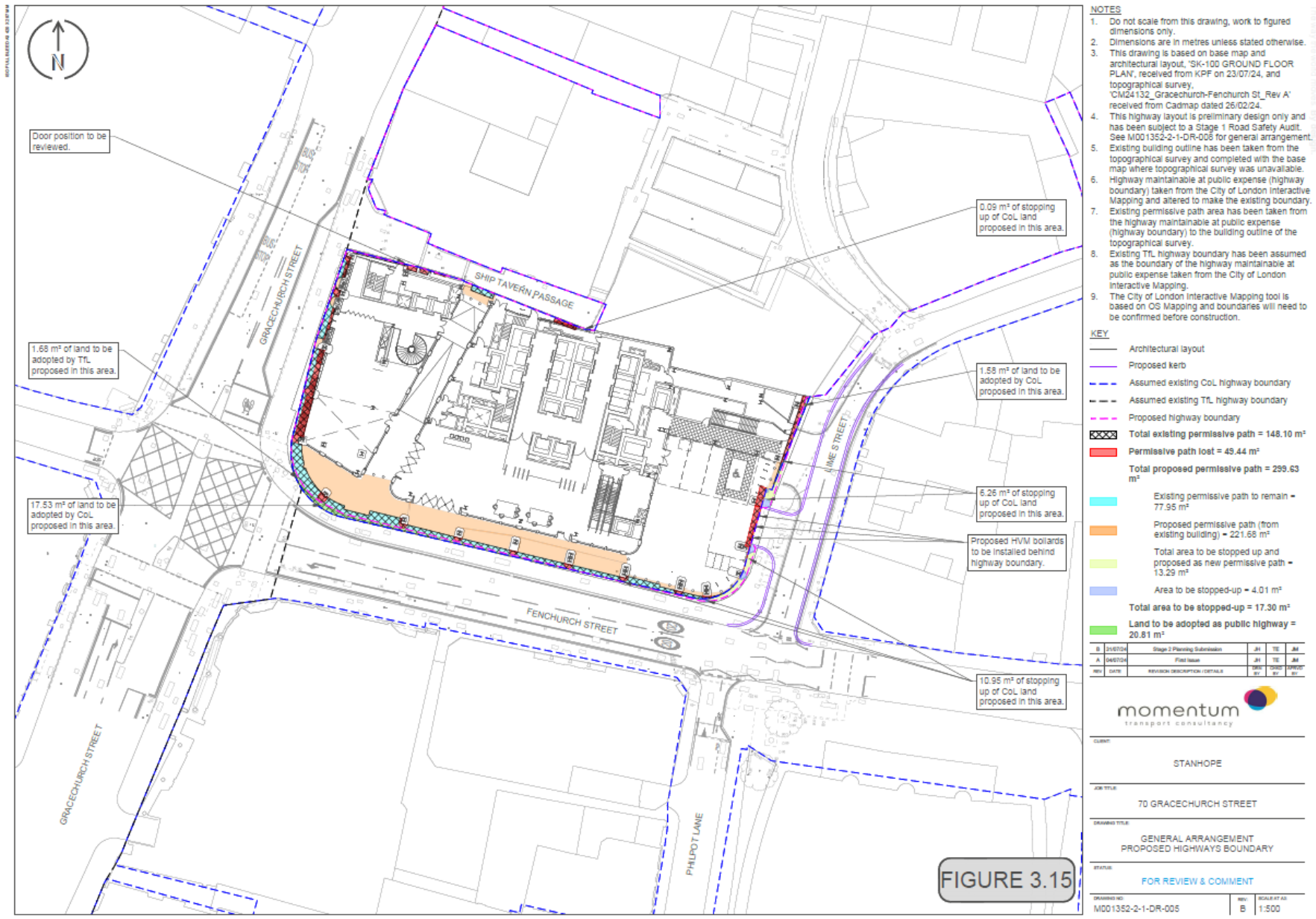
The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

In undertaking assessments a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.

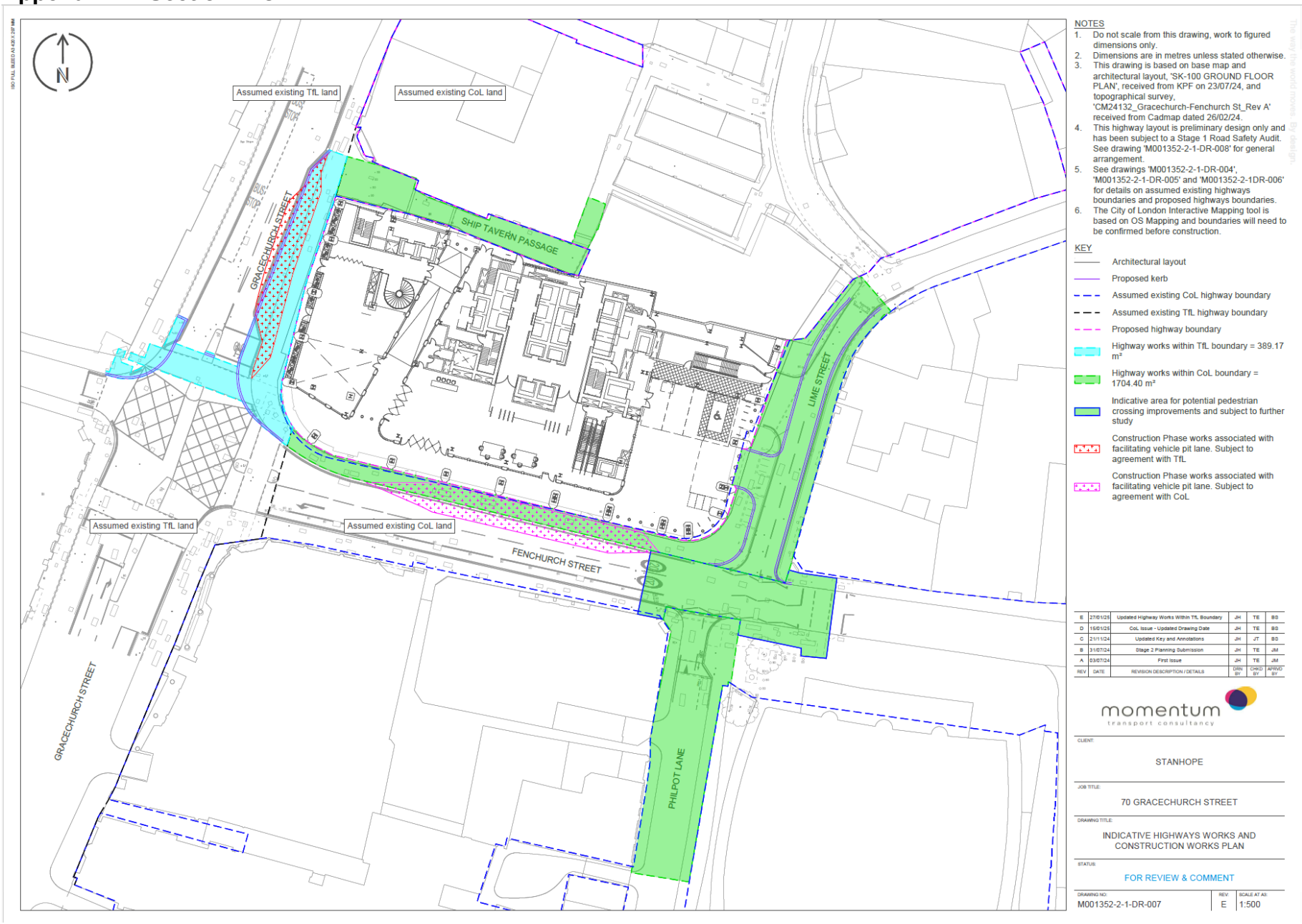
It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

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

Appendix D – Stopping Up Plan



Appendix E - Section 278



NOTES

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.
3. This drawing is based on base map and architectural layout, 'SK-100 GROUND FLOOR PLAN', received from KPF on 23/07/24, and topographical survey, 'CM24132_Gracechurch-Fenchurch St_Rev A' received from Cadmap dated 26/02/24.
4. This highway layout is preliminary design only and has been subject to a Stage 1 Road Safety Audit. See drawing 'M001352-2-1-DR-008' for general arrangement.
5. See drawings 'M001352-2-1-DR-004', 'M001352-2-1-DR-005' and 'M001352-2-1DR-006' for details on assumed existing highways boundaries and proposed highways boundaries.
6. The City of London Interactive Mapping tool is based on OS Mapping and boundaries will need to be confirmed before construction.

KEY

- Architectural layout
- Proposed kerb
- Assumed existing CoL highway boundary
- Assumed existing TfL highway boundary
- Proposed highway boundary
- Highway works within TfL boundary = 389.17 m²
- Highway works within CoL boundary = 1704.40 m²
- Indicative area for potential pedestrian crossing improvements and subject to further study
- Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with TfL
- Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with CoL

REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY
E	27/01/25	Updated Highway Works Within TfL Boundary	JH	TE	BS
D	15/01/25	CoL Issue - Updated Drawing Date	JH	TE	BS
C	21/11/24	Updated Key and Annotations	JH	JT	BS
B	31/07/24	Stage 2 Planning Submission	JH	TE	JM
A	03/07/24	First Issue	JH	TE	JM

momentum transport consultancy

CLIENT: STANHOPE

JOB TITLE: 70 GRACECHURCH STREET

DRAWING TITLE: INDICATIVE HIGHWAYS WORKS AND CONSTRUCTION WORKS PLAN

STATUS: FOR REVIEW & COMMENT

DRAWING NO:	REV:	SCALE AT A3:
M001352-2-1-DR-007	E	1:500

SCHEDULE

APPLICATION: **24/00825/FULEIA**

XL House, 70 Gracechurch Street, London, EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

CONDITIONS

SEE OVERLEAF

Compliance	
	Time Limit The development hereby permitted shall be begun before the expiration of five years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
	Approved Drawings The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: **PA-001 SCHEDULE OF DRAWINGS/MATERIAL LIST** **PA-002 SECTION CUT AND ELEVATION MARKER KEY PLAN** **PA-006 SITE LOCATION PLAN** **PA-007 LAND OWNERSHIP PLAN** **PA-008 GROUND FLOOR BLOCK PLAN** **PA-039 DEMOLITION PLANS BASEMENT 3, B2, B1 AND LG** **PA-040 DEMOLITION PLANS GROUND FLOOR** **PA-041 DEMOLITION PLANS LEVEL 01, L01MEZZ, L02 AND L03** **PA-044 DEMOLITION PLANS LEVEL 4, L05, L06 AND L07** **PA-048 DEMOLITION PLANS LEVEL 08 AND ROOF PLAN** **PA-050 DEMOLITION ELEVATIONS NORTH AND SOUTH** **PA-051 DEMOLITION ELEVATIONS EAST AND WEST** **PA-097 PROPOSED PLANS BASEMENT 03** **PA-098 PROPOSED PLANS BASEMENT 02** **PA-099 PROPOSED PLANS BASEMENT 01** **PA-100 PROPOSED PLANS GROUND FLOOR** **PA-101 PROPOSED PLANS LEVEL 01, 02, 03 AND 05** **PA-106 PROPOSED PLANS LEVEL 06, 07, 08 AND 10** **PA-111 PROPOSED PLANS LEVEL 11, 16, 18 AND 19** **PA-123 PROPOSED PLANS LEVEL 23, 24, 26 AND 27** **PA-128 PROPOSED PLANS LEVEL 28, 29, 30 AND 31** **PA-132 PROPOSED PLANS LEVEL 32 AND ROOF PLAN** **PA-200 PROPOSED NORTH AND SOUTH ELEVATION CONTEXT** **PA-201 PROPOSED EAST AND WEST ELEVATION CONTEXT** **PA-220 PROPOSED NORTH ELEVATION** **PA-221 PROPOSED SOUTH ELEVATION** **PA-222 PROPOSED EAST ELEVATION** **PA-223 PROPOSED WEST ELEVATION** **PA-250 PROPOSED SECTION AA** **PA-251 PROPOSED SECTION BB** **PA-252 PROPOSED SECTION CC**

	PA-301 PROPOSED WALL TYPE 1A **PA-302 PROPOSED WALL TYPE 1B** **PA-303 PROPOSED WALL TYPE 1C** **PA-310 PROPOSED WALL TYPE 2A** **PA-320 PROPOSED WALL TYPE 3A** REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.
	Parking A minimum of one car parking space suitable for use by people with disabilities shall be provided on the premises in accordance with the approved details prior to occupation of the development, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. Passive Electric Vehicle charging facilities shall be provided for the space, as well as a plan to make it active, when it is safe to do so. REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
	Larger Cycle Spaces Unless otherwise approved in writing by the Local Planning Authority, a minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
	Showers and Lockers Unless otherwise agreed in writing by the Local Planning Authority, a minimum of 56 showers and 739 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
	Servicing Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

	REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
	Public Realm Levels The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway. REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
	Refuse Facilities Refuse and recycling, storage and collection facilities shall: (a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) thereafter be maintained as approved throughout the life of the building. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
	No doors over public highway No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1900.
	GPDO Telecoms Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building (to the roof above the building line), including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
	BMU At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

	REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
	Air Quality
	Generators Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must comply with guidance within the City of London Air Quality SPD. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
	AQ Report Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D
	AQNA Prior to the installation of any generator(s) to be used for any purpose outside of emergency life-safety, a revised air quality neutral assessment that considers the building emissions must be submitted and approved in writing by the Local Planning Authority. The air quality neutral assessment must follow the latest air quality neutral guidance. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.

	Air Quality Positive Assessment Prior to the installation of any generator(s) a revised air quality positive assessment that maximises the developments benefits to air quality must be submitted. The air quality positive assessment must follow the latest air quality positive guidance. REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan
	Flues Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces. REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2025, Local Plan Policy DM15.6 and London Plan policy SI1.
	NRMM Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
Environmental Health	
	Roof Terrace Hours The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.

	REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
	Roof Terrace Music No amplified shall be played on the roof terraces. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
	No Promoted Events There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
	Scheme of Protective Works - Demolition There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
	Scheme of Protective Works - Construction There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other

	environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.
	Sound insulation The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority. REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
	Fume extract arrangements Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues should terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place. REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
	Extract and ventilation No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve

	that unit in accordance with a scheme approved by the Local Planning Authority. Flues shall terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
	Ventilation Maintenance All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
	Plant Noise a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. Emergency plant will be expected to meet this criterion. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
	Vibration Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

	REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
	Site Investigation Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Contaminated Land No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's current guidance. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Contaminated Land Remediation

	Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's current guidance. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Piling – Sewer Vents Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building. REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	NRMM Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

	REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
Flooding/Water	
	Thames Water – Foul water capacity No development shall be occupied until confirmation has been provided that either: 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. ASON: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents
	Thames Water – Surface water capacity No development shall be occupied until confirmation has been provided that either: 1. Surface water capacity exists off site to serve the development, or; 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or; 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents
	Thames Water – Piling Method Statement No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and Piling Layout Plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved Piling

	Method Statement and Piling Layout Plan. ason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure
	Thames Water – Network upgrades No development shall be occupied until confirmation has been provided that either: 1) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or 2) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development
	Thames Water – Construction within 5m of water main No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure
	SuDS Design Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 3 l/s from one outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 287.08 m3;

	(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
	SuDS Maintenance Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
Archaeology	
	Written Scheme of Investigation No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

	This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
	Aviation – Construction Methodology No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport. REASON: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.
	Aviation – Building Obstacle Lighting Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development. REASON: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport
Sustainability	
	Circular Economy Prior to commencement of development (excluding demolition and enabling works): a) a re-use strategy of the façade stone shall be submitted to and approved in writing by the Local Planning Authority. The strategy must detail how the existing façade stone (in part or full) will be integrated into the new façade system, or justify alternative opportunities for reuse. b) If the reuse of the assigned 120 tonnes of deconstructed structural steel onsite identified in the pre-demolition audit is not feasible, a detailed justification shall be submitted to the Local Planning Authority. To help mitigate the carbon impact of this change in

	specification, exemplary initiatives to reduce embodied carbon emissions associated with the new building structure and for the reuse of the existing steel, shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. REASON: To ensure whole life-cycle carbon is reduced and circular economy principles are applied to demonstrate compliance with Policy SI 2 of the London Plan and emerging City Plan 2040 policy DE1. To satisfy the Local Planning authority that the proposed development has prioritised re-use and the reduction of waste in accordance with London Plan policies D3, SI 7, SI 8, Local Plan policies CS17 and DM 17.2, and emerging City Plan 2040 policy DE1.
	Post-Construction Circular Economy No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the 501 proposed targets stated in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
	Whole Life Cycle Carbon Emissions Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark (as current at the time of planning decision and to the same methodology) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development in accordance with London Plan policies SI 2, SI 7; Local Plan policies CS 17, DM 15.2, and emerging City Plan 2040 policies S8 and DE1.

	Whole Life Cycle Carbon Prior to commencement of development (excluding demolition and enabling works), if less than 50% of the existing substructure can be retained - for the purpose of supporting the new development, thereby avoiding emissions associated with new construction - a detailed justification for substructure demolition shall be submitted to the Local Planning Authority prior to the commencement of construction except below ground works. To help mitigate the associated impact of substructure demolition and replacement on carbon emissions and construction waste, exemplar initiatives to reuse any materials from the existing building shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. REASON: To ensure whole life-cycle carbon is reduced and circular economy principles are applied to demonstrate compliance with Policy SI 2 of the London Plan and emerging City Plan 2040 policy DE1. To satisfy the Local Planning authority that the proposed development has prioritised re-use and the reduction of waste in accordance with London Plan policies D3, SI 7, SI 8, Local Plan policies CS17 and DM 17.2, and emerging City Plan 2040 policy DE1.
	Post-construction whole-life cycle carbon emissions Once the as-built design has been completed (upon commencement of RIBA Stage 6 the **post-construction Whole Life-Cycle Carbon (WLC) Assessment** (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
	Façade System Prior to the commencement of development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the operational and embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings and shall remain in place for the lifetime of the development.

	REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1
	District Heating Network Connection The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. If feasible, before the network comes into operation, a strategy shall be submitted to and approved in writing by the Local Planning Authority which includes relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
	Climate Change Resilience Sustainability Statement Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
	Climate Change Resilience Measures – completion details Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development

	is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
	BREEAM A post construction BREEAM assessment for the office use and separately for the Sui Generis use, demonstrating that a target rating of 'Excellent' shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
	Updated Biodiversity Net Gain Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
	Greening and Biodiversity Prior to the relevant works, a detailed landscaping strategy describing the quality and maintenance of the proposed urban greening and biodiversity measures. During design development stage the strategy shall identify further opportunities to improve the greening and biodiversity contribution (at ground level and on buildings) with a set of enhancement measures to be agreed with the Local Planning Authority. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To ensure the development delivers the highest quality public realm with the highest feasible levels of greening and biodiversity and supports wellbeing, and climate resilience including minimising the urban heat island, and reducing heat stress and flood risk in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG2, G5 and G6, Local Plan policies DM15.5, DM 18.3 and DM19.2, emerging City Plan 2040 policies DE2, OS2, OS3 and OS4.

	Ecological Management Plan Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided •Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.
	Post Construction UGF and BNG Within 6 months of completion details of the measures to meet the approved minimum Urban Greening Factor of 0.33 and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
	Energy Strategy Prior to the commencement of development, excluding demolition, an **updated Energy Assessment** confirming the detailed design stage opportunities for operational carbon reduction from the building to futureproof the development for low carbon operation is required to be submitted to and approved in writing by the Local Planning Authority. These opportunities should include: a. Further exploration of passive measures to reduce cooling demand b. Further exploration of opportunities to incorporate/maximise green/low carbon technologies e.g. PV panels The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the

	development. REASON: To ensure that the development is sustainable and that operational greenhouse gas emissions have been minimised as far as possible including minimising both annual and peak energy demand and maximising opportunities for renewable energy, improving performance against the GLA target of a 35% emissions reduction over Part L. Also to ensure optimal climate resilience (overheating, heat stress, resource efficiency) including that the risk of overheating has been reduced as far as practical and that all passive measures have been explored in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG6, SI 2, SI 3 and SI 4 - Local Plan 2015 policies DM 15.2, 15.5 - emerging City Plan 2040 policy CR1.
	Green/Blue Roofs Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
	Emergency Power Supply Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. REASON: To demonstrate that operational carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policies S8, DE1.
Design and Public Realm	
	Maximum Heights The maximum heights of the approved building shall be 149.67m AOD to the uppermost point of the Tower (including lift overrun). REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: CS10, DM10.1, CS12 and CS14.
	Design Details

	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy; (b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration; (c) details of canopies; (d) typical masonry details, including jointing and any necessary expansion/movement joints; (e) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards; (f) details of semi-internal elevations fronting the ground floor public routes; (g) full details of the Public viewing gallery and winter garden, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses; (h) details of soffits, hand rails and balustrades, including those soffits in the semi-external areas of the podium between ground and garden level (i) details all party wall treatments; (j) details of junctions with adjoining premises; (k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; (l) details of all drainage and irrigation; (m) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level; (n) details of the legible London wayfinding sign and porous wind mitigation screen within the new north/south route; and (o) details of the improvement works at the junction of Lime Street and Fenchurch Street. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
	Masonry Facades Before the works thereby affected are begun, sample panels of agreed sections of the masonry facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:

	DM3.2, DM10.1, DM10.5, DM12.2.
	Balustrades and Suicide Prevention Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for all external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM 10.1, DM10.3
	Landscaping Details Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) full details of the of the public spaces, including flooring, street furniture, boundary treatments, seating, lighting, soffits, bollards; (b) particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access; (c) details of handrails and balustrades and staircases and steps; (d) details of all drainage, irrigation and rainwater harvesting; (e) details of bollards and integrated HVM; and (f) details of gradients and levels. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4, DM10.8.
	Unbuilt Surfaces All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, undercroft, new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of: a) Irrigation; b) Provision for harvesting rainwater run-off from road to supplement irrigation; c) Spot heights for ground levels around planting pit; d) Soil; e) Planting pit size and construction; f) Tree guards; and g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved

	details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
	Urban Greening Details Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for (a) planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; (b) the incorporation of green roofs into roof surfaces; and (c) the landscaping of the public realm; Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
	Lighting Strategy Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: (a) lighting layout/s; (b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits); (c) a lighting control methodology; (d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; (e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; (f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; and

	(g) details of aviation lights including locations. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7.
	Street Lighting Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details and comply with the adopted Lighting Strategy SPD. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1, and DM15.7
	Wind Mitigation No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority. REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Signage Strategy Prior to occupation of the relevant building, the following details relating to wayfinding and signage strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall address the

following:

(a) Key access points for the office and retail uses;
(b) Key access points for the publicly accessible spaces and facilities including the public viewing gallery and winter garden;
(c) Cycle parking;
(d) Publicly accessible WC's and Changing Places Facilities;
(e) Accessible Car Parking; and
(f) Servicing and Delivery

Each of the above must highlight accessible routes.

All signage placed on the development site shall be in accordance with the approved strategy and shall be installed prior to occupation of each relevant use and retained as such for the life of the uses.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM 10.1, DM10.5, DM10.6, DM10.8, and DM15.7.

Accessibility

Inclusion and accessibility

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20
(b) all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate
(c) security measures including provision of wider aisle gates at all controlled points of entry
(d) Planting to all public landscape areas including path widths and seating
(e) An inclusive entrances strategy including details of doors, opening mechanisms, surface contrast and any control points
(f) Public Realm at grade details including: recesses in seating for wheelchair users and buggies and assistance animals; seating at a range of heights; seating should allow for wheelchair users to transfer; back rest and arm rests for support when rising; and single and group seating.
(g) Lifts showing internal fit out, size, capacity and that they can accommodate people using larger motorised wheelchairs and Class C mobility scooters and stair access.
(h) Horizontal movement through the building demonstrating that there is sufficient space for wheelchair users to pass, rest points, colour contrast of 30 LRV and clear wayfinding through the building.
(i) Inclusive Toilet Strategy including details of the fit-out of the Changing Places, facilities, wheelchair accessible, ambulant accessible and larger toilets, single sex toilets, and baby changing facilities.

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the

	London Plan.
	Access Management Plan Prior to occupation, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved, which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: Website information including photos and an easy read version with information on: Travel distances from key points of arrival and rest points Location of dropped kerbs c) Facilities available on-site including dimensions and photos for (as appropriate): i) Entrance to accessible parking and details of how to reserve spaces ii) entrances, lift access and queues and how these will be managed iii) controlled entry points (showing wider gates) iv) accessible toilets including access to keys for operation including at ground floor v) Changing Places toilets provision including but not exclusively at lower ground floor and for the other publicly accessible areas vi) Baby changing facilities including at ground floor and for the other publicly accessible areas vii) 'universal', female and male toilet provision at ground floor and for the other publicly accessible areas viii) facilities for assistance animals ix) equipment loan x) assistive listening system and other assistive technology xi) rest and recovery facilities xii) room for reflection/quiet room xiii) culture space 2) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering. nclusive Entrances Strategy The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
Highways and Transportation	

	Restricting numbers of deliveries/servicing There shall be no more than 88 delivery and servicing motorized vehicles daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50%) excluding cargo bikes. REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
	Restricting Hours of deliveries and servicing Deliveries and servicing, including refuse/recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 22:00 to 06:00, Monday to Sunday, including Bank Holidays. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM 16.1, DM21.3
	Site Condition Survey Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Gradients Prior to the commencement of works including demolition, details of the proposed gradient levels for the dual-use space at ground level must be submitted to confirm the gradients for the accessible parking space and the surrounding area to ensure level thresholds. REASON: To ensure continuity between the level of the proposed ground floor levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement

	in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Demolition Logistics and Management Plan Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition shall be carried out other than in accordance with the approved details and methods. The Demolition Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching DLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing. • Deconstruction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • Deconstruction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • encouraging the use of cargo bike deliveries throughout the deconstruction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout deconstruction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

	Construction Logistics and Management Plan Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No construction shall be carried out other than in accordance with the approved details and methods. The Construction Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the construction phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any construction commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • Construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • Encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
	Changing Facilities and Showers Notwithstanding the details shown on the approved drawings, details of the changing facilities, showers and lockers shall be submitted and approved

	by the Local Planning Authority. The areas shall be implemented and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3.
	Travel Plan An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: CS16, DM16.1.
	HVM The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works excluding demolition hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
	Paving and drainage Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed. REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
	Cycle Parking

	Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details, to the following, shall be provided in a drawing (scale of no less than 1:20): (a) Full layout of long stay and short stay cycle parking; (b) of the accessible routes to the parking areas; (c) The cycle lifts to be shared at times with goods delivered. Further details are required to ensure that this solution does not interfere with functions of each, as proposed; (d) Assessment on the numbers of cyclists arriving/departing at peak periods. It must be shown that there is sufficient capacity for cyclists to move from the cycle entrance to get to/from the cycle parking areas. List the security measures, if any, required to open the door; (e) Provide details on the cycle rail channels, including the cycle parking journey from on-street to the parking space, showing full dimensions and gradients. The details shall further comprise of long stay cycle parking of 1,106 spaces and short stay cycle parking of 65 spaces unless otherwise agreed in writing. 5% of cycle parking spaces to be provided for larger accessible cycles/adapted cycles, and suitable cycle lifts and other associated facilities provided. The cyclist facilities shall thereafter be retained and operated in accordance with the approved details for the life of the building. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1, DM 16.3.
Fire	
	Fire Safety The development shall be carried out in accordance with the approved details within the Fire Statement prepared by Arup dated July 2024. REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.
Land Use	
	Uses The development shall provide (all figures GIA excluding plant):

	• Office (Class E(g)(i)) – 78,711sq.m • Retail/Food and Beverage (City Market) (Class E (a/b)) – 195sq.m • Cultural Space/Public Viewing Gallery (Sui Generis) – 1,273sq.m REASON: To ensure the development is carried out in accordance with the approved plans.
	Offices The areas within the development marked as Office (Class E(g)(i)) on the floorplans hereby approved, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and in accordance with policy CS1 of the Local Plan 2015.
	Retail/Food and Beverage The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
	Cultural/Public Viewing Gallery The areas within the development marked as Cultural/Public Viewing Gallery on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

	REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11.

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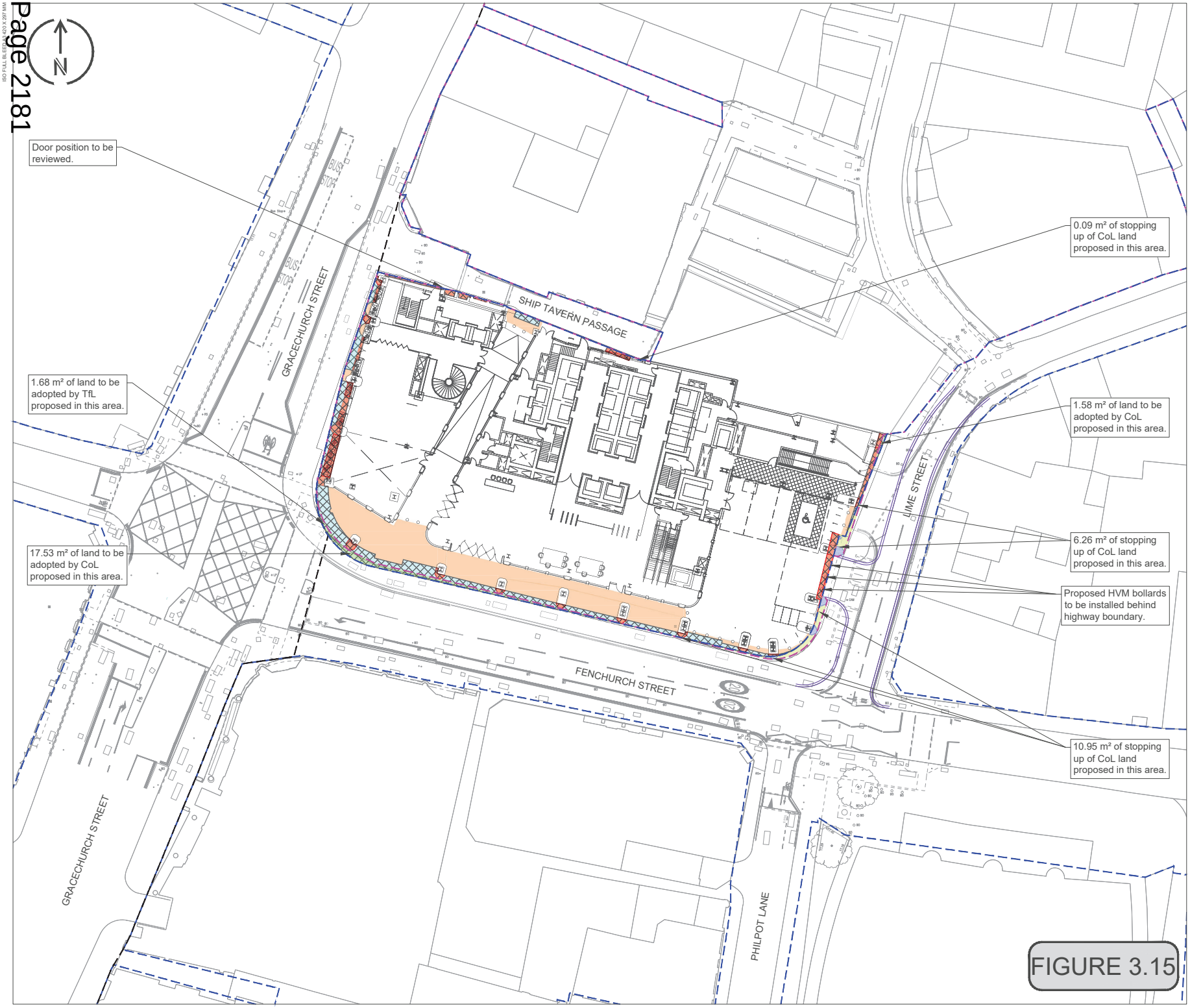


FIGURE 3.15

NOTES

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.
3. This drawing is based on base map and architectural layout, 'SK-100 GROUND FLOOR PLAN', received from KPF on 23/07/24, and topographical survey, 'CM24132_Gracechurch-Fenchurch St_Rev A' received from Cadmap dated 26/02/24.
4. This highway layout is preliminary design only and has been subject to a Stage 1 Road Safety Audit. See M001352-2-1-DR-008 for general arrangement.
5. Existing building outline has been taken from the topographical survey and completed with the base map where topographical survey was unavailable.
6. Highway maintainable at public expense (highway boundary) taken from the City of London Interactive Mapping and altered to make the existing boundary.
7. Existing permissive path area has been taken from the highway maintainable at public expense (highway boundary) to the building outline of the topographical survey.
8. Existing TfL highway boundary has been assumed as the boundary of the highway maintainable at public expense taken from the City of London Interactive Mapping.
9. The City of London Interactive Mapping tool is based on OS Mapping and boundaries will need to be confirmed before construction.

KEY

- Architectural layout
- Proposed kerb
- Assumed existing CoL highway boundary
- Assumed existing TfL highway boundary
- Proposed highway boundary
- **Total existing permissive path = 148.10 m²**
- **Permissive path lost = 49.44 m²**
- **Total proposed permissive path = 299.63 m²**
- Existing permissive path to remain = 77.95 m²
- Proposed permissive path (from existing building) = 221.68 m²
- Total area to be stopped up and proposed as new permissive path = 13.29 m²
- Area to be stopped-up = 4.01 m²
- **Total area to be stopped-up = 17.30 m²**
- **Land to be adopted as public highway = 20.81 m²**

REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APPRVD BY
B	31/07/24	Stage 2 Planning Submission	JH	TE	JM
A	04/07/24	First Issue	JH	TE	JM

momentum transport consultancy

CLIENT: STANHOPE

JOB TITLE: 70 GRACECHURCH STREET

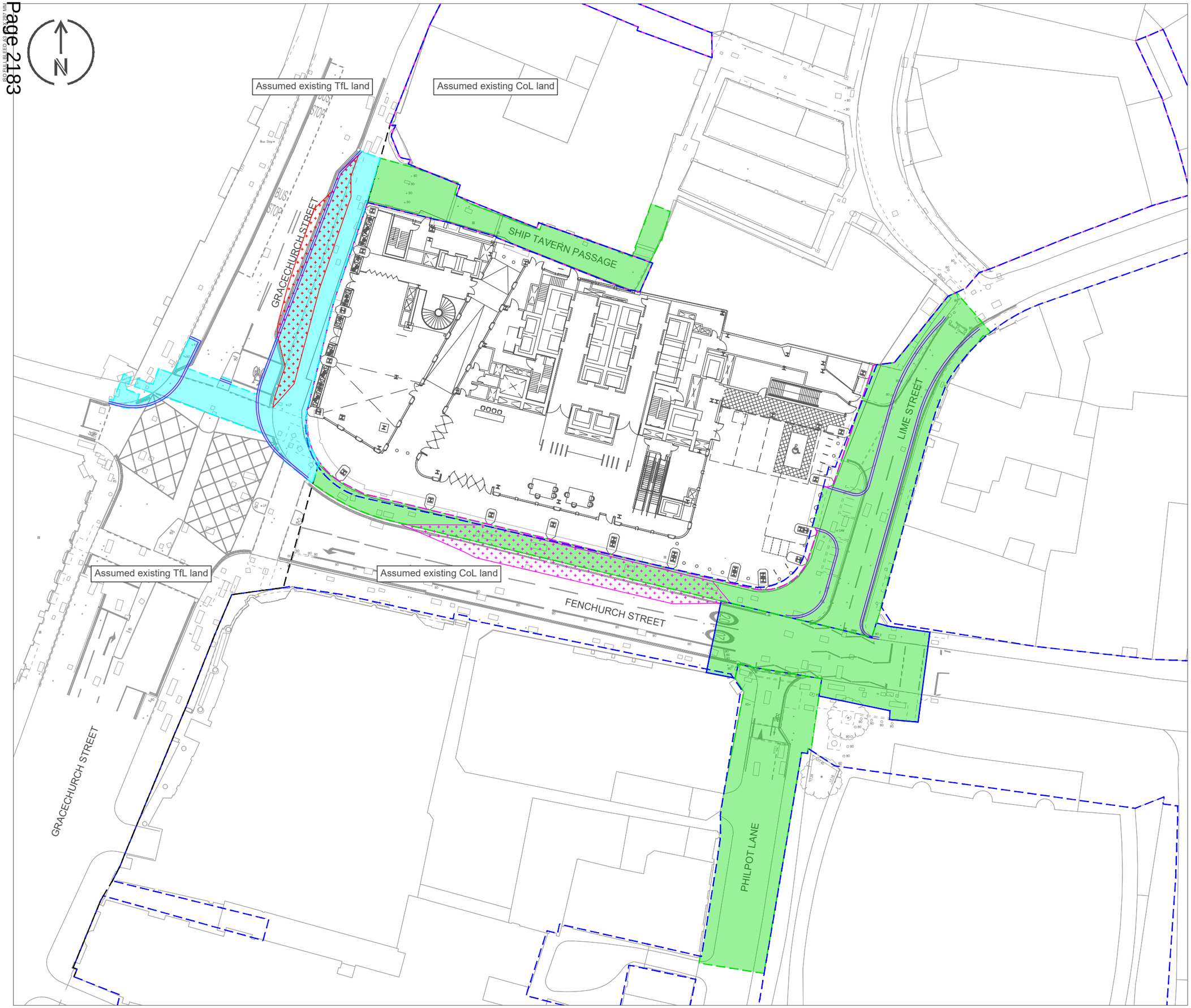
DRAWING TITLE: GENERAL ARRANGEMENT PROPOSED HIGHWAYS BOUNDARY

STATUS: FOR REVIEW & COMMENT

DRAWING NO:	REV:	SCALE AT A3:
M001352-2-1-DR-005	B	1:500

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ISO FULL BLEED A1 (841.00 x 594.00 MM)



NOTES

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.
3. This drawing is based on base map and architectural layout, 'SK-100 GROUND FLOOR PLAN', received from KPF on 23/07/24, and topographical survey, 'CM24132_Gracechurch-Fenchurch St_Rev A' received from Cadmap dated 26/02/24.
4. This highway layout is preliminary design only and has been subject to a Stage 1 Road Safety Audit. See drawing 'M001352-2-1-DR-008' for general arrangement.
5. See drawings 'M001352-2-1-DR-004', 'M001352-2-1-DR-005' and 'M001352-2-1DR-006' for details on assumed existing highways boundaries and proposed highways boundaries.
6. The City of London Interactive Mapping tool is based on OS Mapping and boundaries will need to be confirmed before construction.

KEY

- Architectural layout
- Proposed kerb
- Assumed existing CoL highway boundary
- Assumed existing TfL highway boundary
- Proposed highway boundary
- Highway works within TfL boundary = 389.17 m²
- Highway works within CoL boundary = 1704.40 m²
- Indicative area for potential pedestrian crossing improvements and subject to further study
- Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with TfL
- Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with CoL

REV	DATE	REVISION DESCRIPTION / DETAILS	DRN BY	CHKD BY	APRVD BY
E	27/01/25	Updated Highway Works Within TfL Boundary	JH	TE	BS
D	15/01/25	CoL Issue - Updated Drawing Date	JH	TE	BS
C	21/11/24	Updated Key and Annotations	JH	JT	BS
B	31/07/24	Stage 2 Planning Submission	JH	TE	JM
A	03/07/24	First Issue	JH	TE	JM

momentum transport consultancy

CLIENT:

STANHOPE

JOB TITLE:

70 GRACECHURCH STREET

DRAWING TITLE:

INDICATIVE HIGHWAYS WORKS AND CONSTRUCTION WORKS PLAN

STATUS:

FOR REVIEW & COMMENT

DRAWING NO:	REV:	SCALE AT A3:
M001352-2-1-DR-007	E	1:500

The way the world moves. By design.

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Historic England

Amrith Sehmi
Planning Administration
Environment Department
City of London Corporation

Your Ref: 24/00534/SCOP
Our Ref: 221572

Contact: Helen Hawkins
[redacted]

07 June 2024

Dear Amrith,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

70 Gracechurch Street London EC3V 0HR
Request for an EIA Scoping Opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the redevelopment of the site known as 70 Gracechurch Street. The proposed development comprises development of a new tower (154.7m AOD, 32 storeys excl. basement) for office (Class E) and cultural use (Class F2), retail and food and beverage uses (Class E) (circa 70,000sqm GIA); 4 basement levels, servicing access, landscaping, and other associated works

Advise Archaeology Scoped in to EIA

Thank you for your consultation received on 24 May 2024.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

Archaeology should be scoped into the ES. The site is located over the first and second Roman fora and much of the site has been archaeologically excavated previously for the current development. Some areas of the site were not excavated however, and

Positive about disabled people
Stonewall DIVERSITY CHAMPION

archaeological remains were preserved in situ.

The ES/and appendix will need to consider both the potential Roman archaeology and the remains of St Dionis Backchurch. Previous and current impacts will be key and results and locations of previous excavations will need to be included. Areas where archaeology was preserved in situ should also be illustrated.

Continuing preservation of any surviving remains would be a priority for the new development and arrangements for the preservation of these remains should be outlined in the ES.

This response relates solely to archaeological issues.

Yours sincerely

Helen Hawkins

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

From: PlanningGatewayOne
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00825/FULEIA
Date: 29 August 2024 14:17:05
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because it does not meet the purpose of a relevant building.

Further information is available on the HSE website here.
Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-5789) in all future correspondence.

Ethan Fakir
Operational Support Planning Gateway One | Building Safety Division
Health And Safety Executive, Redgrave Court, Merton Road, Bootle, Merseyside, Liverpool, L20 7HS
☎: ✉: PlanningGatewayOne@hse.gov.uk



-----Original Message-----
From: PLNComments@cityoflondon.gov.uk
<PLNComments@cityoflondon.gov.uk>
Sent: Thursday, August 29, 2024 10:17 AM
To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 24/00825/FULEIA

Dear Sir/Madam

Please see attached consultation for XL House 70 Gracechurch Street London EC3V 0HR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amrith Sehmi
Environment Department
City of London
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https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7CPlanningGatewayOne%40hse.gov.uk%7C4cb77653225c4172664e08dcc80b64d9%7C6b5953be6b1d4980b26b56ed8b0bf3dc%7C0%7C0%7C638605199498666604%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=4DJV7GKRaFG5nZh65ImnESY%2BhnAqiWsSmdVxdbTCho0%3D&reserved=0

From: DO - Airport Safeguarding/BAA
To: PLN - Comments
Subject: Re: Planning Application Consultation: 24/00825/FULEIA
Date: 29 August 2024 10:44:38
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.

AIRPORT SAFEGUARDING LIMITED

Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU
United Kingdom
[redacted]
M | [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

CYVIRUS BRIGHTON CITY AIRPORT

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 29 August 2024 10:05
To: DO - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 24/00825/FULEIA

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam

Please see attached consultation for XL House 70 Gracechurch Street London EC3V 0HR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Annrith Sehmi
Environment Department
City of London

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Memo

To Department of Planning & Transportation

From Paul Jones
Contract and Drainage Service
Department of the Built Environment
Telephone [redacted]
Email [redacted]

Date 30 August 2024

Subject GREASE TRAP REQUIREMENT

For action

Application PT_AS/24/00825/FULEIA

Address: **XL House 70 Gracechurch Street London EC3V 0HR**

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;

ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones

Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

30 August 2024
Crossrail Ref: CRL-IP-3250

Dear Amrith Sehmi,

24/00825/FULEIA: XL House 70 Gracechurch Street London EC3V 0HR
Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development..

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 29 August 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

LPA Ref: 24/00825/FULEIA

London City Airport Ref: 2024/LCY/198

Date: 04/09/2024

Dear Amrith Sehmi,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	24/00825/FULEIA
Proposal	Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement
Location	XL House 70 Gracechurch Street London EC3V 0HR
Borough	City of London
Case Officer	Amrith Sehmi

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Construction Methodology Condition

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).
The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale
On behalf of London City Airport

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 6 September 2024
Our Ref DS/FS24/0034
Your Ref PT_A S/24/00825/FULEIA
Subject XL House 70 Gracechurch Street London EC3V 0HR

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

I have reviewed the fire statement and have no comments. I consider that the application meets policies D5 and D12.

creating a better place
for people and wildlife

Environment Agency

Amrith Sehmi
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137437/01
Your ref: 24/00825/FULEIA

Date: 13 September 2024

Dear Amrith,

70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Thank you for reconsulting us on the above planning application.

There are no environmental constraints within our remit and therefore we have **no comments on** the proposal and have the following advice.

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. ‘major’ developments) should achieve the BREEAM ‘excellent’

standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your local planning authority for more information.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLSustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 12 September 2024
Our Ref DS/SUDS24/00050
Your Ref PT_AS/24/00825/FULEIA
Subject XL House 70 Gracechurch Street London EC3V 0HR

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the submitted information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 3 l/s from one outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 287.08 m^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

Historic England

Mr Amrith Sehmi
City of London Corporation
Guildhall
PO Box 270
London
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01582065

18 September 2024

Dear Mr Sehmi

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

XL HOUSE 70 GRACECHURCH STREET LONDON EC3V 0HR
Application No. 24/00825/FULEIA

Thank you for your letter of 29 August 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The current proposal would broadly conform to the same design parameters as the recently consented scheme on this site. We previously raised concerns about the proposed tall building's harmful impacts on the significance of London's historic environment, including to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS), St Paul's Cathedral and Leadenhall Market. These impacts remain similar in the new application proposals. We recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views.

Historic England Advice

Significance of the heritage assets

a) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value. They reflect the Tower's role as the setting of many significant episodes of European history and as a model example of the development of a medieval fortress palace. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower's landmark siting and visual dominance are key aspects of its significance and adverse impacts on these will affect the integrity of the World Heritage Site. These elements of significance, as experienced through views into, within and out of the property are increasingly vulnerable due to tall buildings in the City and additional development has the potential to compound this harm.

b) St Paul's Cathedral

The cathedral sits on the highest point in the City and is a world-famous landmark. It was founded in 604; the rebuilding of the previous medieval cathedral on the site was undertaken by Sir Christopher Wren from 1675-1710. His Baroque design, incorporating a great dome, is instantly recognisable and has long presided over London's skyline. It is seen amongst the spires of Wren's City churches and represents the crowning achievement of one of the most highly regarded figures of western architecture. It's symbolism of London as a City and Diocese is unrivalled; it is grade I listed.

c) Leadenhall Market

The market is one of the oldest in London; it was first recorded in the grounds of the Leaden Hall in 1321 and gradually became formalised following the gift of the manor to the City Corporation in 1411. The present market buildings designed by Sir Horace Jones were constructed in 1881. The arcades are top lit and the natural variations in light levels contribute to its internal character and vitality. The characterful, atmospheric building is a highly valued part of the historic City and is grade II* listed.

Impact of the proposals

The current proposals are broadly similar to the recently consented scheme at this site (20/00816/FULEIA). Various aspects of the design have been revisited, including the partial retention of the existing building on the site. The scale and massing remain similar, as do the harmful impacts on the settings of the heritage assets, which we note here:

a) Tower of London World Heritage Site

We previously found that the proposed development would cause some harm to the Tower of London because of the increase of modern development appearing in keys views from the Inner Ward and these impacts remain broadly the same. Though the harm would be modest, it would contribute to the erosion of attributes of its OUV, and consequently the integrity of the WHS.

b) St Paul's Cathedral

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.

St. Paul's is the Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development in the City Cluster should be of an appropriate height and of high architectural design quality.

The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an 'outlier' further to the right. The visual tension created by the cluster in this view of St Paul's Cathedral and on the wider character of the City is likely to increase as the mass of the cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral.

c) Leadenhall Market

The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as the loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.

We recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and improved public realm in general. We acknowledge that better accessibility to the adjacent grade II* listed Leadenhall Market also has the potential to improve its setting.

Relevant policy and guidance

a) The City of London Plan 2015 - 2026

Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value…of the Tower of London World Heritage Site and its local setting."

Policy CS13: Protected Views, aims "to protect and enhance significant City and

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

London views of important buildings, townscape and skylines…by…securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."

Policy CS14: Tall Buildings, states that such development will only be permitted on sites that are considered suitable, having regard to the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. The policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

b) The London Plan 2021

London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the policy reserves the strongest protection, stating that new tall buildings "must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it".

c) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an

irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Paragraphs 200-201).

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Historic England's position

We reiterate the concerns that we have previously raised about similar development proposals on this site, and the expansion of the Cluster in general, given the harm it would cause to heritage assets of the highest possible designations.

The status of the Tower of London as a World Heritage Site means that preserving that part of its significance, from which it derives its attributes of OUV, as well as its integrity and authenticity, must be given the greatest possible weight as required by the NPPF. The City's adopted policies alongside those of the London Plan provide for a robust protection of the City's historic environment and its skyline, including the Tower and Cathedral.

UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative impact of tall building development within the Tower of London's setting.

We acknowledge that the consented scheme is now a material consideration and recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views, which we welcome. Nevertheless, the harm we have identified will need to be taken into account.

Recommendation

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage

Historic England

Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [redacted]

Planning and Place
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place
Amanda Reid

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Amrith Sehmi
City of London
Environment Department
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 18/09/2024
My Ref: OB/24/05734
Your Ref:
24/00825/FULEIA

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

70 Gracechurch Street, LONDON, EC3V 0HR

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development:	This Council is asked for its observations on an application submitted to the City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.
Site Address:	**70 Gracechurch Street, LONDON, EC3V 0HR**
RBKC Drawing Nos:	OB/24/05734
Applicant's Drawing Nos:	
Application Dated:	29/08/2024
Application Completed:	29/08/2024

FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S) ATTACHED OVERLEAF

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see Advice for Builders on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at **http://www.rbkc.gov.uk/OB/24/05734 .** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/292705 **.** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

From: Location Enquiries
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00825/FULEIA
Date: 19 September 2024 12:58:24

THIS IS AN EXTERNAL EMAIL

FAO Amrith Sehmi,

24/00825/FULEIA
Location: XL House 70 Gracechurch Street London EC3V 0HR
Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN

Please consider the environment before printing this e-mail.

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Thursday, August 29, 2024 10:07 AM
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00825/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for XL House 70 Gracechurch Street London EC3V 0HR .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amrith Sehmi
Environment Department
City of London
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Website: http://www.cityoflondon.gov.uk

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Date: 19 September 2024
Our ref: 487074
Your ref: 24/00825/FULEIA

FAO Amrith Sehmi
City of London Planning

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Planning consultation: Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b))development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.
Location: XL House 70 Gracechurch Street London EC3V 0HR

Thank you for your consultation on the above dated 29 August 2024 which was received by Natural England on 29 August 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Richard Gibson
Consultations Team

From: BCTAdmin@thameswater.co.uk
To: Hyla - Complaints
Subject: 3rd Party Planning Application - 24/00825/FULEIA
Date: 20 September 2024 10:49:47

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 63849
Your Ref: 24/00825/FULEIA

20 September 2024

Dear Sir/Madam

Re: 70, GRACECHURCH STREET, LONDON, EC3M 7HB

Waste Comments
With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either- 1. Foul water Capacity exists off-site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865312678%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=oudxsndhxYIdSZYDxaISC1TrbIXccf5XR21D1=VY%2FvHGk%3D&reserved=0

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There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865352967%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=hdqJtH3N%2BP0rgndQ5fiUdnROBF3U598cqfer52BVDO8%3D&reserved=0

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-development%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865333982%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=DMoQPv%2BuAvpzpXmyPJPXUkoIsjec4FFBi1eVcL0gdG1%3D&reserved=0 Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Supplementary Comments

The accompanying documents contain a flood risk & drainage strategy, there is nothing to confirm points of discharge and split of discharge (if applicable) for both FW & SW, and this is required to confirm if there is sufficent capacity for the proposed development.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:0203 577 9998
Email: devcon.team@thameswater.co.uk

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Visit us online https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865339077%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Hvlul8i%2BIUND9P3rY%2FMsAeRDuBp4NxNUBVvV7Yoqul1g4%3D&reserved=0 , follow us on twitter https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865344434%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=YPZcfSYMBtdLIoAwK4wr%2Bp5oXRxxdi33LIEgPILJzy0%3D&reserved=0 or find us on https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswaterk&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C601e03a028ba483c10ad9bdcd9598cba%7C96e658cdb3ca4056851932228fa96bad%7C0%7C0%7C638624225865350274%7CUnknown%7CTWFpbGZsb3dby|WIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=bh%2BDp5E7h6Vr67h88UUkomBKO5Vsa6bvJ2arfWFHEK8%3D&reserved=0. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Corporation of London Department of Planning & Transportation
PO Box 270 Guildhall London EC2P 2EJ
20 September 2024

Our DTS Ref: 63849 Your Ref: 24/00825/FULEIA

Dear Sir/Madam

Re: 70, GRACECHURCH STREET, LONDON, EC3M 7HB

Waste Comments
With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. “No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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Water Comments

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Supplementary Comments
The accompanying documents contain a flood risk & drainage strategy, there is nothing to confirm points of discharge and split of discharge (if applicable) for both FW & SW, and this is required to confirm if there is sufficent capacity for the proposed development.

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

Thames Water
It's everyone's water

Your Ref:
Our Ref: 24/02748/OBS

Lambeth

Amrith Sehmi

City Of London
PO Box 270
Guildhall

23rd September 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amrith Sehmi

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 24/02748/OBS Date of Application: 29.08.2024 Date of Decision 23.09.2024

Proposed Development At: **Adjoining Borough Observations Within The Corporation Of London**

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to: 'Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.', at: XL House 70 Gracechurch Street, London, EC3V 0HR (24/00825/FULEIA).

Approved Plans

Cover letter dated 29/08/2024

Conditions

1 London Borough of Lambeth raises no objections.

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

PEOBSZ

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 23rd September 2024

CAROE ARCHITECTURE

Surveyor to the Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: [redacted]
Web: www.caroe.com

Amrith Sehmi
Development Division
Corporation of the City of London
Sent via email only

23 September 2024

Dear Amrith,

Letter Responding to Planning Application: 70 Gracechurch Street (ref: 24/00825/FULEIA)

Introduction

Further to review of the application documents and with reference to pre-application discussions, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposals for the development at 70 Gracechurch Street.

Background

We thank the project team for reaching out regarding pre-application discussion on the scheme and for their time and thoughtful presentation. We are in receipt of additional information they have shared.

The proposals include the construction of a new tall building to 70 Gracechurch Street, presenting a change from the building previously consented on this site, including a new design approach which proposes to retain the ground floor podium.

Given the fact the submission scheme has not fundamentally changed form that seen at pre-application, our comments below echo those previously issued.

Planning Policy Context

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given consideration as to the emerging draft City Plan 2040 (previously City Plan 2036). Whilst a broad range are policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

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The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment
- Policy DM 12.1 Managing change affecting all heritage assets and spaces
- Core Strategic Policy CS13 Protected Views
- Core Strategic Policy CS14 Tall Buildings

One of the particular points of emphasis within the Emerging City Plan 2040 – and as directed by the GLA – is the correct and suitable placement of tall buildings. The spirit of these emerging policies therefore has some relevance for this application.

The London Plan 2021:

- Policy D1: London's Form, character and capacity for growth
- Policy D4: Delivering Good Design
- Policy D9: Tall Buildings
- Policy HC1: Heritage Conservation and Growth
- Policy HC3: Strategic and Local Views
- Policy HC4: London View Management Framework

National Planning Policy Framework:

- Chapter 12: Achieving well designed places
- Chapter 16: Conserving and enhancing the historic environment

Comment

Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of the greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street, it is widely understood that Chapter

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would be strongly opposed to any development proposals that impinges on kinetic views of the Processional Way, which - if there were any visibility – would have the potential to cause a high level of visual impact and subsequent heritage harm to this Grade I listed building of exceptional significance.

We therefore welcome the assurances within the application pack that the proposals now brought forward will not be visible in these views – including confirmation that there is absolutely no 'technical visibility' so often discussed in relation to similar schemes. We are assured by the documentation that the scheme will be invisible.

An additional pre-application meeting held Thursday 9th May was of great assistance with regards to understanding how views and impacts on the Processional Way are today assessed and measured with the technology now available. We understand that a more accurate 'worst case scenario' is now taken for testing, with viewpoints taken 30cm from the building line in an approximation of how the public interact with this space. We understand that the design changes to the upper levels of the scheme have ensured this 'cloak of invisibility' in the new design.

We welcome that the proposed scheme appears to improve on that previously consented in this regard, in-part using the much-improved assessment and visualisation techniques.

We would still stress the importance of total invisibility within any views along the Processional Way, which if achieved avoids all adverse visual impact and heritage harm. We request that this is absolutely confirmed by Officers in relation to the proposals, beyond the scenario presented.

The proposals will also be appreciable in views from the southeast where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the right-hand side of the Cathedral.

LVMF guidance for this view states that *'New tall buildings should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality.'* and that ultimately proposals would maintain the visual prominence of the Cathedral and not diminish the ability to appreciate the building as a Strategically Important Landmark.

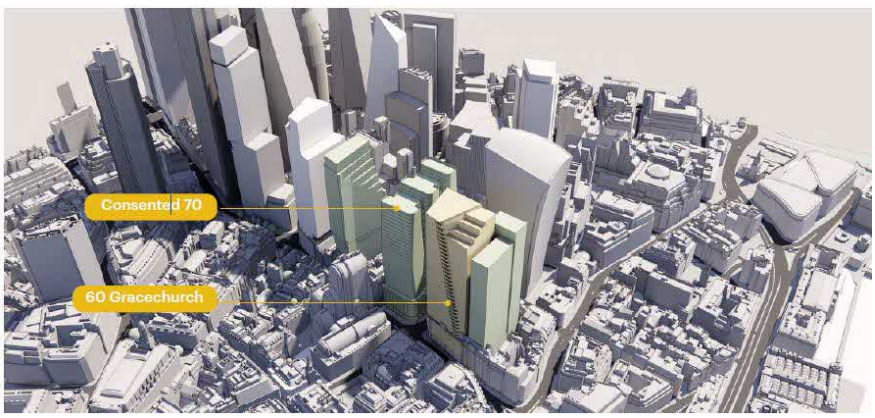
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In terms of built heritage, ill-judged development at the site as appreciable in views such as 15B.2 has the potential to cause heritage harm through unacceptably increasing the visual presence of the cluster as a whole, thus challenging the pre-eminence of the Cathedral on the London skyline and the historic and architectural special interest of St Paul's as a Grade I listed building.

From recent experience we understand the rate of change occurring within the cluster and those buildings that have been consented between the central core of the cluster and the 'Walkie-Talkie' – 20 Fenchurch Street.

We note from the additional pre-application information that the emerging proposals are marginally lower in height than the consented scheme (though would seek this to be confirmed by the project team for the submission scheme). We welcome the decrease in height, even if minor, as this appears to start to deliver a recognition that shaping the overall form of the cluster is a valid concern in terms of urban design. We have concerns regarding the height and massing of tall buildings in this area, especially with regard to the nearby emerging scheme for 60 Gracechurch Street.

The cumulative baseline, including the recently submitted 60 Gracehcurch Street, is somewhat depicted in the application documents. However, given the proximity of the two schemes and the fact that detailed information is now available for both 60 and 70, we would welcome rendered AVRs of both to illustrate the cumulative impact of the proposals – for both schemes. (We would draw Officers attention to our response to 60 Gracechurch Street recently issued, as we suggest that both schemes have an inter-relationship that should be acknowledged).

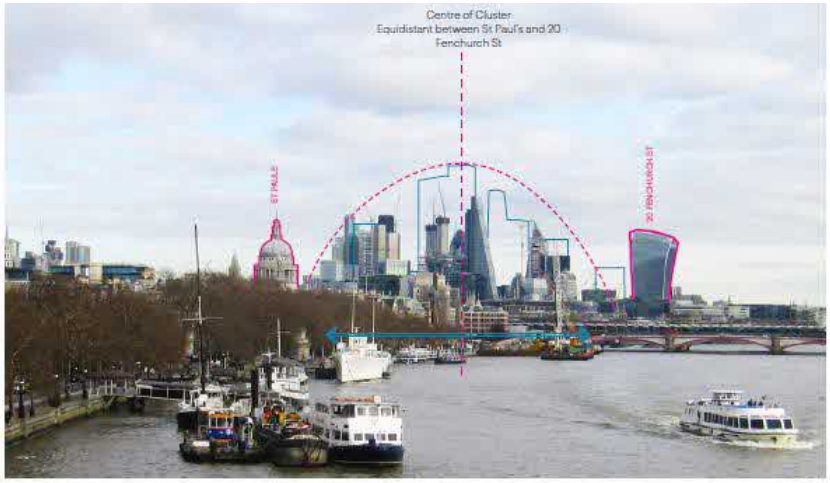


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We would hope to see rendered views of both 60 and 70 Gracechurch Street together in context given their proximity.

We consider that new proposals in this area should not attempt to use the bulk and mass of 20 Fenchurch Street as a 'datum', thus creating a high 'wall' of built form. Instead we would recommend that the built-form should diminish in height between the centre of the cluster and its edge (as outlined within the application material below). Any decrease and downward gradation in height and massing as part of a considered urban whole should therefore be encouraged.



The current and adopted policy and design principles on which the cluster has been managed, which this development and others on Gracechurch Street markedly changes

Surveyor to the Fabric

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This is a broader urban design and compositional point that we have iterated as part of our response to 60 Gracechurch Street and directly with the City planning team. However, it is concerned with the context that this project and others must establish, given the rate and co-incidence of several major co-related development proposals.

Conclusion

We welcome the removal of this development from any visible impact on the Processional route and would seek this is absolutely confirmed in all such views.

Our view is that decision-makers should examine closely the overall built-form of this emerging expansion of the cluster and consider how to judge regulate the relationship of this development in relation to proposed neighbours.

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward.

Yours sincerely,

[redacted]

Surveyor to the Fabric

cc: Tom Nancollas, Deputy Director (Design), City of London
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:
Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:
Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

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London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

Amrith Sehmi
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

25th September 2024

Applicant:
Amrith Sehmi
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2024/02157/OBS**

Registered on: **30th August 2024**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

XL House 70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b))
development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward



Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

30 September 2024
Crossrail Ref: CRL-IP-3276

Dear Amrith Sehmi,

24/00825/FULEIA : XL House 70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 29 August 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

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The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Amrith Sehmi
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/24/01511
Your ref: 24/00825/FULEIA

1 October, 2024

Enquiries to: Eleanor Downton
Tel:
Email: [redacted]

Dear Amrith Sehmi,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	XL House 70 Gracechurch Street London EC3V 0HR
Proposal	Observation requested by City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above applciation. I would be grateful if you would take the observations set out about into consideration:-

1. **CITY OF LONDON REFS: 24/00825/FULEIA**

   TOWER HAMLETS REF: PA/24/01511

The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

ADDRESS: XL House 70 Gracechurch Street London EC3V 0HR

PROPOSAL:

Observation requested by City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking,
flexible public realm including street market with associated highway works and other works associated with the development.

COMMENTS:

These proposals are for a new mixed use tall building development comprising ground plus 32 storeys (on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site (WHS). The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.

The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.

London Plan Policy HC2 sets out that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

The Outstanding Universal Value (OUV) of the WHS is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its

prominence is the townscape is a key component of this value.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 7, 9, 10A, 10B, 10C and 10D. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

The proposed development raises concerns about the degree of visual separation between the eastern cluster and the Tower of London. This was similarly raised in response to a previous development on the site, COL ref 20/00816/FULEIA.

City of London Corporation should consider whether views 9, 10b and 13 should be provided as rendered views, as the proposed development is clearly visible alongside the massing of existing developments in the area.

Based on the views reviewed, it is concluded that the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. As similarly raised in objection to the proposed development at 60 Gracechurch Street (24/00743/FULEIA), LBTH is concerned that the Tower of London WHS has already reached its limit in terms of visual intrusion and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS.

EIA STATEMENT:

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the Proposed Development at the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where not addressed.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an

assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.22 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Climate Change and Greenhouse Gas, Solar Glare and Built Heritage. The following aspects and matters that could affect LBTH will result in significant adverse effects, however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate. With respect to other aspects and matters that could affect LBTH including Townscape and Visual Impact Assessment, and Built Heritage, the ES concluded a single significant effect on LBTH relating to View 7: Tower Bridge Approach – north, which would be moderate beneficial.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction that should be taken into account in the assessments. It is unfortunate to see that none of those have been considered. City of London Corporation and the Applicant are still advised to refer to these, noting that a planning application has now been submitted relating to 1-10 Bishops Square (One Spitalfields) site under LBTH reference PA/24/01198, a site which sits within the indicated 1km radius identified by the Applicant.

A Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) has been provided within Volume 2 of the ES. Part 1 of the TBHVIA assesses the likely significant effects of the Proposed Development on townscape and visual receptors. No townscape receptors have been identified within LBTH.

The following visual receptors within LBTH have been identified and considered in the assessment, noting that Views 7, 10A, 10C and 10D have been provided as render images while remaining ones are wireline in TBHVIA:

- View 7: Tower Bridge Approach – north
- View 8: Tower Bridge Approach looking over the workshop
- View 9: Tower Wharf – east of Henry VIII's Watergate
- Views 10A, 10B 10C and 10D within the Tower of London

- View 13 LVMF 10A.1 | Tower Bridge: the north bastion

Limited discussion on demolition and construction effects has been provided in paragraphs 6.1-6.5 of Section 6 of Part 1 of the TBHVIA. No details of the effects on individual receptors have been provided.

From the above list of visual receptors, only View 7: Tower Bridge Approach – north will experience a significant effect amounting to moderate beneficial, both during operational and cumulative scenarios.

LBTH welcomes the use of winter photography for the relevant views where necessary so that full impact from the Proposed Development can be understood. However, the TBHVIA concludes different effects conclusions for View 10A within the Tower of London stating that there would be no effect during spring, summer and autumn and negligible-minor neutral effect during winter. It is considered that all effects should be reported on a worst-case basis and as such it is not considered necessary to split the effects. Nonetheless, the stated effect during winter is agreed.

Appendix A provides details on supplementary non-verified views. LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (As shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020) has been included as View A10, which is welcomed. The images produced demonstrate that the Proposed Development would not be visible from this view.

Part 2 of the TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. For receptors within LBTH, this includes the Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and grade I listed Tower Bridge. The Tower of London's designation as Scheduled Monument is only mentioned in the TBHVIA, however, it appears that no assessment on such particular designation has been carried out.

The ES concluded that there would be no effects during demolition and construction, and operation on any built heritage receptors within LBTH.

It should be noted that the assessments within the Townscape, Built Heritage and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

Therefore, in terms of the ES, LBTH has no objections in relation to the

aspects listed, on the basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulations.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control

Tel: 020 8921 5222

Amrith Sehmi
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

24/2331/K

Directorate of Regeneration, Enterprise & Skills
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

01 October 2024

DECISION NOTICE –RAISE NO OBJECTION

Dear Sir/Madam,

Site:	**XL House 70 Gracechurch Street London EC3V 0HR**
Applicant:	Amrith Sehmi City of London
Proposal:	**Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.**
Drawings	Consultation Letter from the City of London, dated 29.08.2024

I refer to your letter dated 29 August 2024 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0038

Date of issue of this decision: 11/11/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0038 **Date of Issue of Decision:** 11/11/2024
Your Ref No.:

Applicant Amrith Sehmi City Planning
City of London

NO COMMENTS made in reference to your consultation on the following development:

Partial demolition of the existing building, partial infilling of the existing basements and
refurbishment and extension of the building comprising basement levels and ground floor
plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and
culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b))
development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking,

At XL House 70 Gracechurch Street London EC3V 0HR

In accordance with your letter received on 29 August 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Historic England

Amrith Sehmi
Planning Administration
Environment Department
City of London Corporation

Your Ref: 24/00825/FULEIA
Our Ref: 223336

Contact: Helen Hawkins
[redacted]

17 September 2024

Dear Amrith,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

XL House 70 Gracechurch Street London EC3V 0HR
Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Recommend Archaeology Conditions

Thank you for your consultation received on 29 August 2024.

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

Assessment of Significance and Impact

POSITIVE ABOUT DISABLED PEOPLE

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

The planning application was accompanied by an Environmental Statement which contained an archaeology chapter and archaeological baseline as an appendix. Whilst the archaeology submission is generally robust and informative, it is disappointing that there was no discussion of the public benefits of the scheme in regards to archaeology. There will be some benefit from use of images of the history of the site and the forum in the proposed digital video wall.

The archaeology baseline highlights that the site lies over the first and second Roman fora. Although the site has been extensively excavated previously, the design of the current building allowed for preservation in situ of some of the Roman fora deposits outside the deep basements. The preservation of these remains will be continued within the new development. Potential impacts on archaeological remains will be limited to two new piles in the south-eastern part of the site. If archaeological remains of significance are identified within the new pile locations, there is scope to move them.

The remains currently preserved on the site are located within a 'conservation structure'. As part of the development, this structure should be checked to ensure it remains robust and that the archaeology is not deteriorating. During the construction phase, the areas to be preserved in situ should be demarcated on site and communicated to all sub contractors.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching three conditions as follows:

Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. details of the foundation design, demolition and construction method, fencing, signage and other control measures to protect the archaeological remains currently preserved in-situ.
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. The land to be included in the WSI should cover all areas of potential archaeological survival but exclude the existing triple basement. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Excavation

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

Archaeological excavation should be carried out in the areas of the two new south-eastern piles, pile caps (depending on proposed depth) and any pile probing areas in advance of construction of the piles. Should significant archaeology be encountered then the pile will need to be moved and the new location excavated to inspect for archaeology. For the piles proposed in the previsouly excavated area, a watching brief should be carried out to confirm that archaeology does not survive in this area.

Preservation in-situ

The areas of the preserved remains should be suitably fenced and their location incorporated into onsite method statements in order to prevent impact in these areas. If any impact is proposed, consent will need to be obtained from GLAAS for the works before they take place.

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

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

Yours sincerely

Helen Hawkins

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

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 22 November 2024
Our Ref 24/05092/NPLN
Your Ref 24/00825/FULEIA

Subject XL House 70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions are attached to any consent :

The roof terraces on hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The

sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. Emergency plant will be expected to meet this criterion.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

Reason: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's current guidance.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property

and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's current guidance.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any

approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

M33 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

Regards

[redacted]

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: [redacted]

From: [redacted]
To:
Cc:
Subject: 24/00825/FULEIA, 70 Gracechurch Street - TfL comments
Date: 02 December 2024 09:54:50
Attachments: Outlook-xowatbli.png
70 Gracechurch Street, City of London, TfL Pre Application Advice.pdf

THIS IS AN EXTERNAL EMAIL

Dear City of London planning,

Please fine below TfL Spatial Planning full formal comments on 70 Gracechurch Street. I also attach our Pre Application advice to the Applicant from 16 April 2024.

Borough Reference: 24/00825/FULEIA

Location: 70 Gracechurch Street

Proposal: Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for consulting TfL. In regard to the above application, TfL have the following comments:

Gracechurch Street (A1213) forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

Trip Generation

The applicant has provided trip rates for lunchtime peak periods between 1pm-2pm – this is supported. The applicant has also clarified that the sites selected within the TRICS database are based on relevant existing office developments within the City of London.

Pedestrian Comfort Levels (PCL)

As requested in TfL's pre-application comments, the applicant has provided further assessment of PCLs, with most expected PCL results a minimum of B+.

Further assessment of PCLs should be provided prior to determination. The applicant has assessed only one arm of the junction (see TA Figure 5.3). A PCL assessment is

needed for all four arms of the junction, such as Lombard St with Gracechurch St and Fenchurch St. It is welcomed that for the assessed junction arm of Gracechurch St and Fenchurch St, the applicant has proposed mitigation for the worst-case scenario score of C+.

The applicant should also provide a PCL assessment of the pit lane and the footway gantry temporary arrangements proposed for construction. This could be secured by pre-commencement condition. The applicant has confirmed that 10% of the pedestrian trips would be diverted on to the new pedestrian route - This is accepted by TfL.

Highway Improvements

The new pedestrian link proposed to join Leadenhall Market via Ships Tavern Passage to Fenchurch Street and A10 Gracechurch Street must be publicly accessible 24 hours a day and 7 days a week and secured by Section 106 (S106).

For the viewing gallery, access is proposed via Gracechurch Street. TfL has requested and recommended access from Ships Tavern Passage instead of the A10. This comment is reiterated from pre-application discussions and should be addressed.

TfL introduced a Traffic Order on the A10 Gracechurch Street corridor in January 2022 which became permanent in July 2023. The order restricts through traffic on parts of the corridor from 7am and 7pm, Monday to Friday. Along with temporary improvements to the corridor implemented as part of the COVID-19 pandemic Streetspace for London programme, this project has improved conditions for pedestrians, cyclists and bus passengers.

In line with Healthy Streets and the Mayor's Vision Zero target to eliminate all deaths and serious injuries from London's transport system by 2041, a contribution is sought towards TfL's permanent works along the A10 corridor, which will both complete and enhance the recent improvements already delivered.

Data collected during the experimental phase of TfL's A10 improvements showed that it resulted in faster bus journey times and safer cycle journeys. Through traffic, including taxis, is now restricted on parts of the corridor between 7am and 7pm, Monday to Friday.

Wider footways were created at points along the route, and further long-term safety and public realm improvements are now being planned for future delivery by TfL, in partnership with the City Corporation as the highway authority for adjoining roads.

Based on a net uplift in floorspace proposed in this application that we estimate to be 52,108 sq m GIA, a £800,900 s106 contribution to the TfL A10 corridor improvement scheme is sought, index linked to the BCIS General Building Cost

Index, not the Retail Price Index.

The payment of £800,900 to TfL will be required prior to commencement, or alternatively the completion of a s278 Agreement with TfL for certain works prior to commencement would be acceptable instead. This can be reflected in the s106 and s278 agreements.

In the event a s278 Agreement for the s278 works has been entered into prior to commencement, the applicant must complete the s278 works prior to occupation.

The TfL highway improvements requested should include but not be limited to:

- safety improvements to junctions in the vicinity of the Site;

- measures in the vicinity of the Site to improve safety and security at night and reduce fear of crime;

- pedestrian corridor improvements in the vicinity of the Site; and

- any other strategic highway mitigation works reasonably necessary to the make the development acceptable

The s278 Works defined should include but not be limited to:

- pit lane on A10 Bishopsgate to support construction of the development (subject to agreement of this requested contribution or alternative equivalent s278 works through further discussion and negotiation with TfL)

- footway improvements to North East corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction

- potential signal retiming at same junction

- supporting highway modelling if necessary

- Road Safety Audits (RSAs)

- following TfL Streetscape Guidance with approval from TfL

- ensuring sufficient space along the A10 for Bus operations and for Cyclists to pass Buses and other traffic safely on the near side both northwards and southwards

- co-ordination with 60 Gracechurch Street development's highway works

- improving the crossings and footways that connect to the North West corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction

To ensure the development complies with London Plan policies T1 (Strategic approach to transport); T2 (Healthy Streets); T4 (Assessing and mitigating transport impacts), T5 (Cycling), D8 (Public realm) and D9 (Tall buildings)

Access

The applicant has conducted a Road Safety Audit (RSA) on the vehicle access from Lime Street; as this impacts local authority highway it is for the City Corporation to consider. The applicant should confirm if the RSA followed TfL RSA procedure SQA-0170.

Pedestrian access is proposed to be from Ship Tavern Passage to the north and Fenchurch Street/Gracechurch Street to the south.

Further work is required including relocation of the proposed entrance to the viewing platform from A10 Gracechurch Street to Ship's Tavern Passage.

Car parking

TfL welcomes that the proposal would be car free, with 1 blue badge parking space in line with London Plan Policy T6. The bay should be marked as a disabled persons parking bay in line with Policy T6. A pre-booking system should be in place to ensure the space is effectively managed. The electric vehicle charging point (EVCP) for this space is welcomed.

Cycle parking

Access:

Cycle parking is proposed to be accessed on the eastern side of the site via Lime Street to access the stairs, or the open space to the south-east of the site for access to the lift. Long stay will be located at basement levels 1 and 2 with associated end of trip facilities, and short stay will be located within the site boundary and at basement level B1.

The applicant should clarify signage and management measures proposed for short stay cycles left overnight, as these may conflict with the delivery and servicing vehicles.

TfL has previously requested the size of the cycle lifts and stairwell gradient to ensure compliance with London Cycle Design Standards (LCDS). This should be provided urgently.

Quantum:

The proposed development would provide 1,106 long-stay cycle parking spaces and 65 short-stay spaces in line with London Plan Policy T5.

The applicant has clarified that 5% of long stay cycle parking spaces are capable of accommodating larger/adapted cycles, and 11% of short-stay spaces are adaptive as per TfL's requests.

3 cargo bike spaces would be provided at grade by the pop-up market and in public space to the south-east of the site. 10 public cycle spaces will be re-provided on Lime Street on City Corporation highway, which is also welcomed.

Design

The applicant has provided further information on the design of the cycle parking spaces - the proposed mix of two tier, Sheffield stands and adaptive spaces is in line with guidance in the London Cycling Design Standards. The applicant should clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided.

Cycle hire

£100,000 only is now requested to part-fund a new docking station in Rood Street. £100,000 previously also requested should be allocated instead to the A10 corridor improvement project mentioned elsewhere.

The TA has set out that a financial contribution to a new Santander cycle hire docking station is acceptable, as per TfL's pre-application request. In discussion with TfL, Rood Lane has been identified as the best potential location, with City Corporation support.

Public realm and healthy streets

The development is designed to connect well with Leadenhall Market and surrounding pedestrian desire lines, strengthening the site's connectivity and enhancing permeability.

The proposed public realm enhancements and pedestrian access are supported in line with London Plan Policies T2 Healthy Streets and D8 Public realm. The proposal to realign the junction between Philpot Lane and Lime Street and widen footways on both roads is also supported.

Deliveries and servicing

Access for deliveries and servicing vehicles is proposed at grade with four loading bays, and the loading area is proposed to be accessed from Lime Street with vehicles entering and exiting the site in forward gear.

TfL welcomes the proposal to consolidate 50% of all deliveries, in line with London Plan Policy T7. It is proposed to have 54 daily delivery and servicing vehicle trips, with 7 in the peak hour.

TfL has previously requested that night-time deliveries occur only, and restrictions outside the hours of 10pm to 6am are now agreed. The Delivery and Servicing Plan (DSP) should be secured by a pre-occupation condition and discharged in consultation with TfL as an affected highway authority for the TLRN.

Construction and demolition

The applicant has provided an outline Construction Logistics Plan (CLP). Due to the sensitive location, TfL would prefer a full CLP prior to determination.

The applicant has clarified the construction working hours would be 8am-6pm Monday-Friday, 9am-2pm Saturday, and no works on Sunday or bank and public holidays.

We have previously advised that a pit lane along Gracechurch Street is not supported. This should be discussed further with TfL prior to determination.

The current CLP proposes that in later stages after the main Fenchurch Street pit lane is not in use, Lime Street will become the main delivery point. The applicant is required to provide a more detailed construction vehicle trip generation forecast to help us understand any spare capacity available across the construction programme in the pit lane on Lime Street.

Swept path analysis showing construction vehicles accessing the loading bay in forward gear has been provided.

Not withstanding final agreement of its acceptability, a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination must be provided.

The proposed DSP commits to engage suppliers who are Fleet Operator Recognition (FORS) members. All construction vehicles should be FORS Silver or Gold accreditation. The applicant has confirmed all construction vehicles will also be compliant with CLOCS.

The applicant should confirm end of trip facilities and temporary cycle parking will be made available to construction workers.

Summary

- PCL assessment for all four arms of the junction, and PCL assessment for pit lanes to be secured by pre-commencement condition.
- Public access to new pedestrian link to be secured by Section 106 (S106).
- Discussion with TfL regarding the proposed access to the viewing gallery; access from the A10 is not supported.
- £800,900 s106 contribution to the TfL A10 corridor.
- Work with 60 Gracechurch Street development's highway works:
- Footway improvements to North East corner of the junction.
- May include improvements to both crossings connecting with the North West corner
- Confirmation that the Lime Street access RSA followed TfL RSA procedure SQA-0170.
- Provide a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination.
- Confirm signage and management measures proposed for short stay cycles left overnight
- Confirm size of the cycle lifts and stairwell gradient to ensure compliance with

LCDS.

- Clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided for cycle stands.
- £100,000 for new TfL Cycle Hire docking station on Rood Lane.
- DSP secured by a pre-occupation condition, discharged in consultation with TfL
- Full CLP secured by pre-commencement condition, discharged in consultation with TfL committing to Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) standards.
- CLP to provide detailed construction trip generation forecast for pit lanes proposed and minimise A10 impact
- Provide end of trip facilities and temporary cycle parking for construction workers.

Thanks and kind regards,

Gavin McLaughlin MSc; MA; MRTPI

Spatial Planning I City Planning

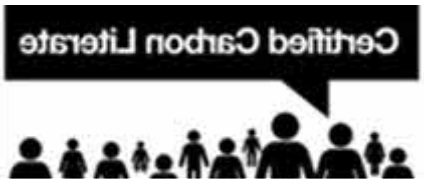
Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

[redacted]

[redacted]

PLEASE CONFIRM ALL MEETINGS BY CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services

This message has been scanned for malware by Forcepoint. www.forcepoint.com

From: Planning Applications
To: PLN - Comments
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 08 January 2025 16:52:50

THIS IS AN EXTERNAL EMAIL

Official

Good afternoon

XL House 70 Gracechurch Street London EC3V 0HR.

Please be advised that this address is not in the Wandsworth Council borough. We are therefore unable to assist.

Best Regards

Planning Technical Support
Planning Department

Chief Executive Directorate
Serving Richmond and Wandsworth Councils
www.wandsworth.gov.uk

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team
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Website: http://www.cityoflondon.gov.uk

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From: PlanningGatewayOne
To: PLN - Comments
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA (Our ref pgo-6466)
Date: 09 January 2025 08:22:45
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

"Dwellings" includes flats, and "educational accommodation" means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application, it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website here.

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the Planning Gateway One team quoting our reference number (pgo-6466) in all future correspondence.
Kind regards

Lisa Gaskill
Operational Support for Planning Gateway One
Health and Safety Executive | Building Safety Division
PlanningGatewayOne@hse.gov.uk

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Wednesday, January 8, 2025 3:26 PM
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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From: Devcon Team
To: PLN - Comments
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 09 January 2025 14:12:32
Attachments: image001.png

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Good Afternoon,

Please note that we provided formal response in August 2024.

I can't see any new additional information in regards to the above planning application, therefore our previous comments still stand.

Kind Regards,

Saira Irshad
Development Planner
Asset Management & Engineering
[redacted]
devcon.team@thameswater.co.uk

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ

Thames Water
It's everyone's water

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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LPA Ref: 24/00825/FULEIA

London City Airport Ref: 2025/LCY/005

Date: 09/01/2025

Dear Amrith Sehmi,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	24/00825/FULEIA
Proposal	Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement
Location	XL House 70 Gracechurch Street London EC3V 0HR
Borough	City of London
Case Officer	Amrith Sehmi

In our previous response, under reference number 2024/LCY/198, an aviation obstacle lighting condition was applied to this development. However, on further review of the proposed elevation, we now realise that the building will not infringe any safeguarding surfaces associated to London City Airport. Therefore, as the building will no longer be classed as an obstacle, there is no requirement for aviation obstacle lights to be applied and the previous condition can now be removed.

Based on the latest consultation, we have the following comments to make.

London City Airport's response must change to an objection unless the following condition is applied to this planning permission.

Construction Methodology Condition

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.

We would also like to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).
The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale
On behalf of London City Airport

From: NATS Safeguarding
To: PLN - Comments
Subject: RE: [SG30608] Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA [SG30608]
Date: 09 January 2025 17:02:49
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

THIS IS AN EXTERNAL EMAIL

Our Ref: SG30608

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Wednesday, January 8, 2025 3:26 PM
Subject: [SG30608] Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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From: DD - Airport Safeguarding/BAA
To: PLN - Comments
Subject: Re: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 10 January 2025 10:15:15
Attachments: image.png

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Classification: Internal

FAO Amrith Sehmi,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification
As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.

AIRPORT SAFEGUARDING LIMITED

Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU
United Kingdom
[redacted]
WEBSITE [redacted]

Visit our website: Home - Airport Safeguarding Limited or connect on LinkedIn - Airport Safeguarding Limited.

CYRRUS BRIGHTON CITY AIRPORT

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

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Transport for London

PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

10 January 2025
Crossrail Ref: CRL-IP-3356

Dear Amrith Sehmi,

24/00825/FULEIA : XL House 70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 08 January 2025, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From: [redacted]
To:
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 14 January 2025 09:44:26
Attachments: 24-00825-FULEIA - Re-Consultation Letter.pdf
70 Gracechurch Street ad cond_223336.pdf

THIS IS AN EXTERNAL EMAIL

Hi Amrith

Thank you for reconsulting me on this application. The proposed amendments do not affect my previous advice, which I have attached for information

Regards

Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: [redacted] Mobile: [redacted]

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

www.historicengland.org.uk

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From: E-Glaas <E-Glaas2@historicengland.org.uk>
Sent: 13 January 2025 15:10
To: Hawkins, Helen <[redacted]>
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Helen

Re-consultation - https://keystone.historicengland.org.uk/resource/2b443f92-ff76-4bbb-889d-19f4a498b2e5#

I have reactivated the case

Steve

Steve Hurst
Business Officer | Barnet | Hammersmith & Fulham | Haringey | Havering | Merton | Richmond Upon Thames
Planning Group | London
Direct Line: [redacted]
[redacted]

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

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

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From: Location Enquiries
To: PLN - Comments
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 14 January 2025 11:39:44
Attachments: image001.png
24-00825-FULEIA - Re-Consultation Letter.pdf

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FAO Amrith Sehmi,

24/00825/FULEIA

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Location: XL House 70 Gracechurch Street London EC3V 0HR.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Wednesday, January 8, 2025 3:26 PM
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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From: [redacted]
To:
Cc:
Subject: Port of London Authority response (DC 831) Plan ref: 24/00825/FULEIA 70 Gracechurch Street
Date: 16 January 2025 11:13:44

THIS IS AN EXTERNAL EMAIL

FAO: Amrith Sehmi

Dear Amrith

Thank you for consulting the Port of London Authority (PLA) on the above mentioned application, for the proposed mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development at 70 Gracechurch Street, London. I have now had the opportunity to review the submitted documents, and given the location of the proposed development in proximity to the Tidal Thames the PLA has no comments to make.

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
[redacted]

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Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 16/01/2025
Your Ref: 24/00825/FULEIA

Subject: 70 Gracechurch Street, London, EC3V 0HR

24/00825/FULEIA | Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

The proposed development is a new application for 70 Gracechurch Street. An AQ ES Chapter was submitted for a previous consented scheme, 20/00816/FULEIA, and the revised AQIA submitted draws on modelling results and drawing conclusions from the 2020 assessment. From reviewing the ES the nearest residential receptors stated were 88 Gracechurch Street and 67 Fenchurch Street, the properties at 4 Bulls Head Passage have not been listed as receptors. These should have been included in the AQIA, but their non-inclusion would not materially change the outcomes.

The AQIA follows a standard structure that can be split into four core areas:

Construction Impacts:

The site has correctly been considered as High Risk as per the City of London AQ SPD, and it has been stated the appropriate mitigation measures will be included to mitigate this risk. A condition will be added with relation to the Scheme of Protective Works required, and this be will assessed in terms of meeting the requirements of the City of London Code of Practice for Construction and Deconstruction. The site will have to comply with London NRMM requirements.

The impact from construction traffic has been judged to be negligible or not significant. There has been a reduction in predicted traffic within this submission compared to the previous consented scheme, therefore it has been assumed this

will result in an improvement in terms of impact compared against the consented scheme.

Operational Impacts:

The development is to be ‘car-free’ with only a Blue Badge parking space. Similarioly to the impact from construction vehicles, the impact from operational vehicles has been judged to be negligible or not significant. There has been a reduction in predicted traffic within this submission compared to the previous consented scheme, therefore it has been assumed this will result in an improvement in terms of impact compared against the consented scheme. Although not detailed within the AQIA, an outline DSP has been completed and this details measures to reduce the number of delivery and service vehicles by 50% compared to the predicted volume.

Heating and hot water are to be provided via non-combustion methods therefore there are no standard building operational emissions associated with the development. It is stated that there is to be a diesel fuelled backup generator for life-safety emergency usage. There are no details provided for this generator apart from that it will be located 3.25m above roof level. Conditions will be required on the basis that no alternatives to the proposed diesel generator have been explored, it has not been confirmed that the NOx emission rate of the generator is below the IAQM/EPUK screening rate, no statement or evidence to show conformity with the City of London AQ SPD.

Air Quality Neutral:

Due to being ‘car-free’, as per GLA guidance and the heating strategy being all-electric the development is deemed air quality neutral, as per GLA guidance. It should be noted that delivery and service vehicles and emergency backup generators for life-safety purposes are excluded from assessment in the GLA assessment.

A condition will be added to ensure that if any tenant generator is proposed for any level of business continuity a revised air quality neutral will need to be completed, taking the emissions from a proposed generator into account.

Air Quality Positive:

A generic air quality positive assessment has been submitted, with the measures included already required through associated London Plan and Local Plan policies. Even without the completion of this document, the measures included

within the matrix would been taken forward as part of the development. Additionally, the matrix has not been completed dully, innovation and futureproofing has been missed out.

Due to this, and the potential update to the development in-terms of the backup power solution a condition will be added to revise this assessment so that it can be shown that the proposal maximises benefits to air quality.

Should the development be approved please attach the following conditions:

Condition M26F

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

Condition M28C amended

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must comply with guidance within the City of London Air Quality SPD. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Air Quality Positive Assessment
A revised air quality positive assessment that maximises the developments benefits to air quality must be submitted. The air quality positive assessment must follow the latest air quality positive guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Air Quality Neutral Assessment
Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral Assessment that considers the building emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

From: HNL Sustainable Places
To: PLN - Comments
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 21 January 2025 17:00:04

THIS IS AN EXTERNAL EMAIL

Dear Amrith,

Thank you for consulting us on this planning application. You will find our response attached. Please let me know if you have any questions.

Kind regards,
Demitry Lyons
Planning Advisor, Hertfordshire and North London Sustainable Places
Environment Agency | 2 Marsham Street, 3rd floor, London, SW1P 4DF
Email: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 020 7714 0578

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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Your Ref:
Our Ref: 25/00060/OBS

Lambeth

Amrith Sehmi

City Of London
PO Box 270
Guildhall

22nd January 2025

RE: REQUEST FOR OBSERVATIONS

Dear Amrith Sehmi

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 25/00060/OBS Date of Application: 09.01.2025 Date of Decision 22.01.2025

Proposed Development At: **Adjoining Borough Observations Within The Corporation Of London**

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to the partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development at XL House 70 Gracechurch Street London EC3V 0HR

Approved Plans

Letter dated 8 January 2025 (ref: 24/00825/FULEIA)

Conditions

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 22nd January 2025

From: [redacted]
To:
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 23 January 2025 09:54:35
Attachments: 24-00825-FULEIA - Re-Consultation Letter.pdf
70 Gracechurch Street ad cond_223336.pdf

THIS IS AN EXTERNAL EMAIL

Dear planning team

Thank you for reconsulting me on this application. The revised information does not affect my previous advice which I have attached for information

Regards

Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: [redacted] Mobile: [redacted]

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

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to: e-glaas@historicengland.org.uk

We will always store your personal details securely. We collect data that you provide to us and only ever collect the information we need in order to carry out our statutory purposes and that helps us to deliver and improve our services. We will only share personal data when we are required to by law or with carefully selected partners who work for us. If you would like to know more or understand your data protection rights, please take a look at our Privacy and Cookies Policy

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2025 15:26
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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Website: http://www.cityoflondon.gov.uk

From: [redacted]
To:
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA
Date: 23 January 2025 15:59:56
Attachments: Y_HERef_P01582065_457282_2400825FULEIA.pdf

THIS IS AN EXTERNAL EMAIL

Dear Amrith

Thank you for re-consulting Historic England on this planning application.

We refer you to our previous advice letter (dated 18 September 2024 –please find attached).

Kind regards

Alex Bowring
Inspector of Historic Buildings and Areas
London and South East Region
Historic England
Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Email: [redacted]

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
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Dear Sir or Madam,

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Comments for Planning Application 24/00825/FULEIA

Application Summary

Application Number: 24/00825/FULEIA
Address: XL House 70 Gracechurch Street London EC3V 0HR
Proposal: Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Amrith Sehmi

Customer Details

Name: Mr Will Ryan
Address: Flat C 4 Bulls Head Passage Leadenhall Market London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I strongly object to this development. It will cast our property into darkness for much of the day, and will leave the historic Leadenhall Market (and associated conservation area) in darkness as well, leading to a loss of character. It looks beautiful at lunchtime and in the early evening as light streams into it. This new building will cut out all that light.

Moreover, we are already facing extreme development and disruption from the development of 85 Gracechurch Street. This further development is forcing us out of our properties and making it unliveable or workable. Surrounded by two hugely dusty building sites to the North and South, creating loud pollution throughout the day and night, I don't see how we can exist here in those conditions.

The existing building is extremely new. Stripping it back and rebuilding (even if using the existing base) seems ridiculous. Adding new access to the market? There are already countless access points to the market. This very minor benefit is at the cost of a huge loss of light, so to present it as

a positive to the market is obscene.

The original planning application was deeply flawed, with residential neighbours and businesses not informed via letter or via publicly visible notices, all under the cover of covid, and it has generally been poorly managed by the City of London and the previous developers. There was no engagement, and the process was poorly conducted.

For these reasons, we strongly object to the development.

Sent on behalf of the residents at 4 Bulls Head Passage, EC3V 1LU.
Will Ryan - myself (Flat C)
Emma Baylis (Flat B)
Mann Vergan (Flat A)

Adjei, William

From: PLN - Comments
Subject: FW: XL House 70 Gracechurch Street London EC3V 0HR

-----Original Message-----
From: Peter Rose
Sent: Sunday, September 29, 2024 1:41 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: XL House 70 Gracechurch Street London EC3V 0HR

THIS IS AN EXTERNAL EMAIL

>
>
> I object to yet another large scale redevelopment.
>
> It represents further densification of the immediate area putting further strain on utilities which are already failing.We have suffered from power cuts recently.
>
> It will produce yet more pollution and late night disturbance in the area.
> This wave of new office buildings will result in a high level of vacancy in the existing office stock.
>
> If planning permission is granted please ensure that working hours and noise limits are strictly enforced.
>
> Kind regards
> Peter Rose
> Jamaica Buildings , St Michael's Alley
>
> London EC3V 9DS

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Committee:	**Date:**
Planning Applications Sub Committee	11th February 2025
Subject: River Foreshore Adjacent to Riverbank House Swan Lane EC4R 3BF Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.	**Public**
Ward: Dowgate	**For Decision**
Registered No: 24/00938/FULLR3	**Registered on:** 11 September 2024
Conservation Area: No	**Listed Building:** No

Summary

Planning permission is sought for the proposed removal/cutting down to bed level of the existing campshed timbers; removal of gabion baskets and steel tie rods between the existing campshed and anchor posts; installation of new sloped revetment formed from imported granular fill and rock mattresses; installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site; and reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

This application relates to the existing foreshore and campshed within the River Thames located adjacent to Swan Lane and Riverbank House. The site is accessed via an area of river walk off Swan Lane.

The wider site, originally Swan Lane Pier, fell out of use in 2012 but retains two existing dolphins and a singular mooring pile riverside, bankseat, steps, loading bay and associated services landside. Swan Lane is located on the north bank of the River Thames and lies upstream of London Bridge and downstream of Cannon Street rail

bridge. The campshed itself covers an area of approximately 2,000sqm of the foreshore, extending approximately 16.8m out from the river wall at its widest point.

The site is not listed or within the curtilage of a listed building, although Fishmongers Hall (Grade II – 56m) and the towers of Cannon Street Railway Station (Grade II – 64m) are within close proximity to the application site. The site is not within a conservation area.

Historically, timber piles have been used to maintain a raised bed profile and support flood defence in this area. However, repair and refurbishment works are now required, as part of the campshed has slumped and several of the timber piles have failed, resulting in bed levels dropping. This in turn, has compromised the structural integrity of the river wall, opening a crack in the wall through water erosion. The proposed works are to essentially repair the existing river defence in the foreshore area.

In principle, the proposal is considered to sustain the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding. As such the proposal is considered to be acceptable in principle, according with the NPPF, London Plan Policy SI 14 AND SI 17, Local Plan Strategic Policy CS9 and draft City Plan 2040 Strategic Policy S17.

61 representations have been received from consultation and all object to the proposals. The representations covered the broad themes of (a) impact on archaeological / historic matters; (b) noise and light pollution; and (c) impact on natural habitats. The representations are addressed within the body of the attached report.

In design terms the proposal would be in keeping with the surrounding foreshore character and the works would read as a continuation of the existing surrounding campshed. Furthermore, the proposal would not have any detrimental harm on the importance or setting of the surrounding designated heritage assets in compliance with CS12 and DM12.1 of the Local Plan 2015 and S11 and HE1 of the emerging City Plan 2040.

The site does not lie within a Designated Archaeological Area, however as the site is located within the historic core of the City of London an Archaeological Desk-Based Assessment has been submitted in support of the application. The Assessment concludes that there is likely a low potential for significant archaeology in the area, however a further written scheme of investigation (WSI) ensuring a programme and methodology of site investigation and recording is suggested prior to development. This conclusion is accepted by Historic England and GLAAS and as such a condition is recommended requiring the submission of such a programme.

Ecologically the application would have an acceptable impact in line with policy and the proposal is also considered to have an acceptable impact on Transport, Highways and Air Quality given the modest nature of the proposal.

Finally, the surrounding neighbouring properties would not by unduly impacted given the location and scale of the works.

Overall, the proposals are considered to accord with the development plan. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

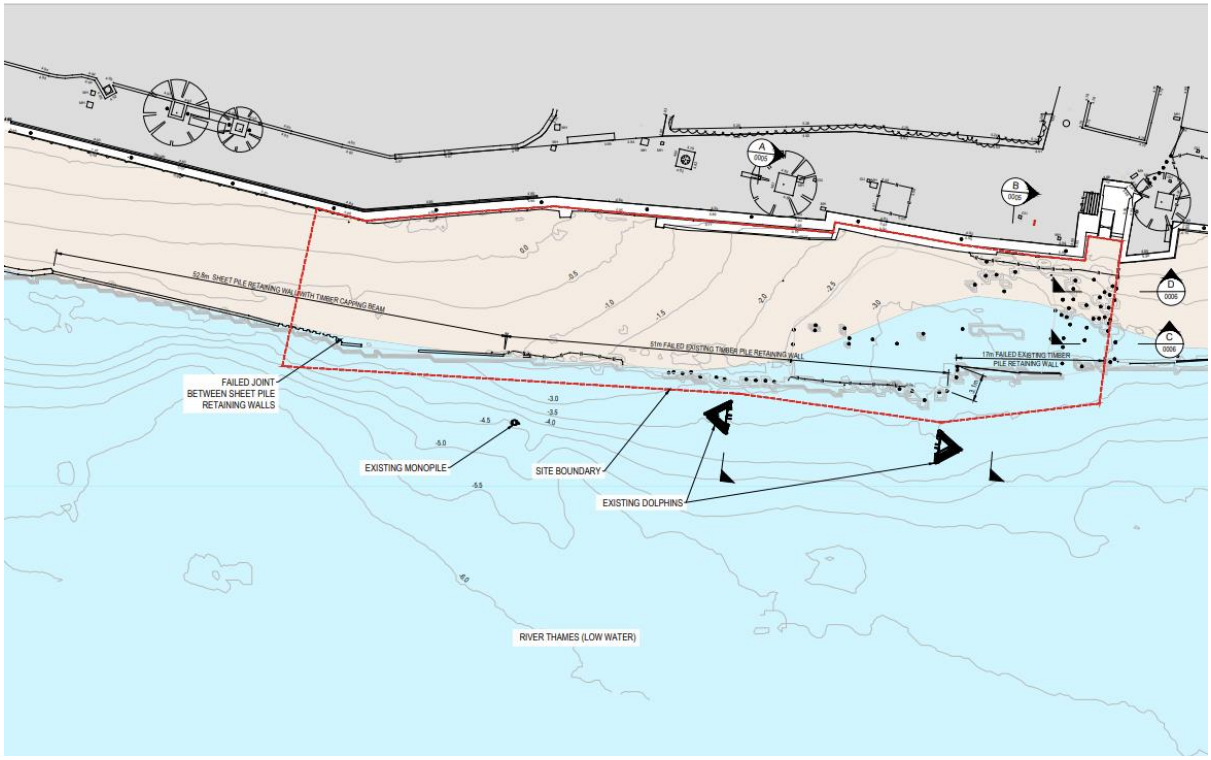
Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Other material considerations also support the grant of planning permission. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

Recommendation

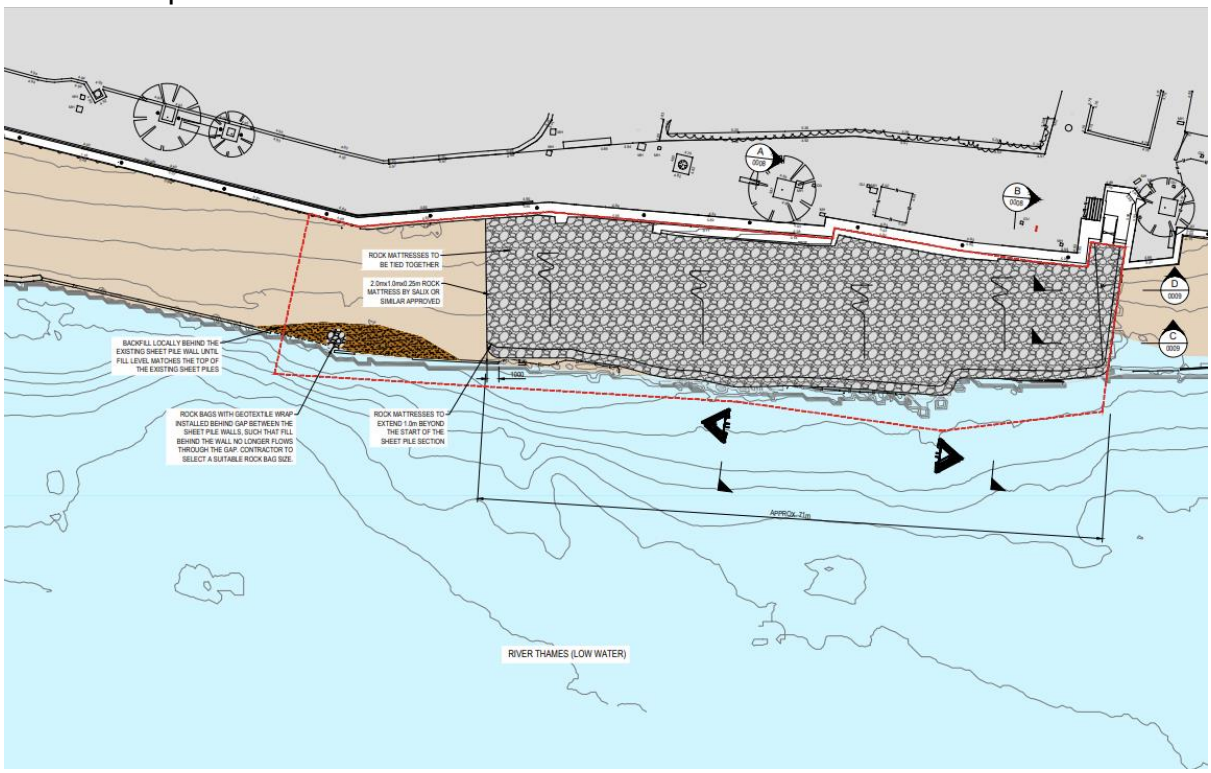
(1) That Planning Permission be granted for the above proposal in accordance with the details set out in the attached schedule.

Plans

Plan 1: Existing Site Plan



Plan 2: Proposed Site Plan



Photos

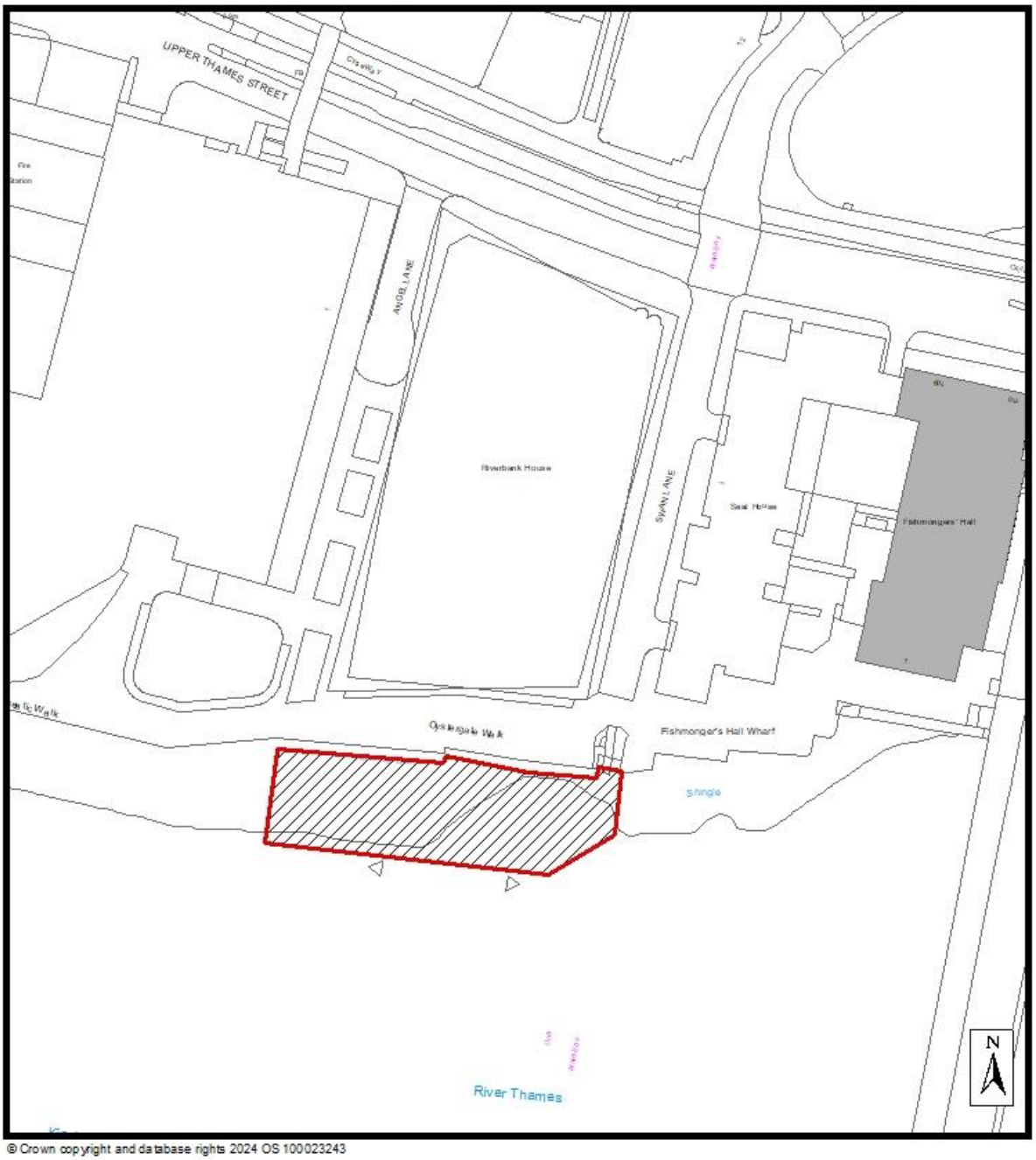
Photo 1: Site as of 2016



Photo 2: Site as of 2022



Site Location Application Plan



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ADDRESS:
Swan Lane - River Foreshore

CASE No.
24/00938/FULLR3

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Main Report

City of London Application and Regulation 64(2)

1. Regulation 64(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") requires that where a proposal for EIA development is brought forward by the City of London Corporation and the City of London Corporation will also be responsible for determining that application for planning permission, they must make appropriate administrative arrangements to ensure that there is a functional separation, when performing any duty under the EIA Regulations, between the persons bringing forward the proposal for development and the persons responsible for determining that proposal.

2. A handling note in line with Regulation 64(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) has been produced alongside this application, in line with procedural requirements related to the City of London acting as both Local Planning Authority and as Applicant. Further context is provided within the note as detailed within the background papers.

Site and Surroundings

3. This application relates to various works to the existing campshed within the River Thames located adjacent to Swan Lane, Oystergate Walk and Riverbank House. The site is accessed via an area of river walk off Swan Lane.

4. The site, originally Swan Lane Pier, fell out of use in 2012 but retains two existing dolphins and a singular mooring pile riverside and bankseat, steps, loading bay and associated services landside. Swan Lane is located on the north bank of the River Thames and lies upstream of London Bridge and downstream of Cannon Street rail bridge. The campshed itself covers an area of approximately 2,000sqm of the foreshore, extending approximately 16.8m out from the river wall at its widest point.

5. The immediate surrounding area is a mix of office, commercial buildings, river frontage, road and rail infrastructure (bridges) and the river itself. Immediately adjacent are several office buildings including Riverbank House, Nomura Bank (1 Angel Lane) and Fishmonger's Hall.

6. Fronting onto the south side of the river in LB Southwark, approximately 200m from the site, there are various office blocks and former wharf buildings which are now converted for either office or residential use. A replica of Sir Francis Drake's ship, the Golden Hinde, is located in between two buildings in the St. Mary Overie dock.

7. The site is not listed or within the curtilage of a listed building, although Fishmongers Hall (Grade II – 56m) and the towers of Cannon Street Railway Station (Grade II – 64m) are within close proximity to the application site. The site is not within a conservation area.

8. The application site falls within the Thames Policy Area as designated by the London Plan (2021) and within a Site of Metropolitan Importance for Nature.

Site Planning History

9. The planning records below represent those most relevant to the proposed development:

10. Planning permission was granted in 1989 (Reference: 2899/1D) to position or to moor adjacent to existing pontoon barge an additional swim ended pontoon measuring 200 ft.

11. Planning permission was granted in 1985 (Reference: 2899/1C) to position a Livery Barge on Old Swan Pier (as a replacement for P.S. 'Princess Elizabeth' a proposed floating restaurant & function venue).

12. In 1975 planning permission was granted (Reference: 2899/1A) to permanently moor Paddle Steamer "Princess Elizabeth" with a brow from Watermen's Steps, to be used for restaurant purposes, at Watermen's Steps, Swan Lane.

13. Planning permission was refused in 1972 (Reference: 2899/1) for a landing platform adjoining Swan Lane Car Park for mooring of helicopter.

14. Planning permission was refused in 2020 (Reference 19/00116/FULL) for the Erection of a new pier within the River Thames at Swan Lane, to comprise a refurbished landside access platform; new canting brow and pontoon; dredging and filling of river bed; repair and reinstatement of campshed and riverbank; replacement of mooring pile and installation of additional mooring pile. (Reason for refusals relating to (1) use of the pier and (2) impact on surrounding occupiers).

Background of Application

15. The Applicant (City of London) have confirmed that the Environment Agency contacted the City in January 2019 to state that urgent repairs were needed to the foreshore. The foreshore has already eroded more than expected in the last two years and it is foreseeable that the erosion could progress so far that the toe of the river wall is exposed.

16. It is likely that emergency stabilisation works will then be required at this point, after which the main repairs works would also still need to be completed. Officers note that these works (including the works detailed under this application) could be undertaken by the Environmental Agency without the need for planning permission under the Floods and Water Management Act 2010 should the situation worsen.

17. For clarity campsheds are manmade raised areas of river foreshore that were typically faced with timber piles. Campshedding is a means to provide structural support to reduce scour and prevent the riverbank collapsing. Historically, campsheds were also constructed to provide a level platform on which boats would sit at low tide keeping them upright.

Proposed Development

18. Planning permission is sought for the proposed removal/cutting down to bed level of the existing campshed timbers; removal of gabion baskets and steel tie rods between the existing campshed and anchor posts; installation of new sloped revetment formed from imported granular fill and rock mattresses; installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site; and reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles

19. Historically, timber piles have been used to maintain a raised bed profile and support flood defence in this area. However, repair and refurbishment works are now required, as part of the timber campshed has slumped and several of the timber piles have failed, resulting in bed levels dropping. This in turn, has compromised the structural integrity of the river wall, creating a crack. The proposed works are to essentially repair the existing river defence.

20. The works encompasses an area of approximately 2,000sqm (0.2 ha) of the foreshore. Where the existing timber piles have failed, these are proposed be cut down to bed level and the pieces removed from site. The riverbed is then proposed to be reprofiled using approximately 1,300m^3 of 6A granular fill (e.g. natural gravel, natural sand, crushed gravel, crushed rock etc) to essentially restore the bed up to historic campshed bed levels. To form a toe of the sloped revetment aqua rock bags would be placed along the same line of the existing failed timber piles. The granular fill would be backfilled behind the rock bag toe and a geotextile layer would be laid to create a firm base on which 2m x 1m x 0.25m rock mattresses would then be laid. The proposed rock mattress would restore approximately 71m of campshed. Well-graded class 6A granular fill material is then proposed be laid above the rock mattresses

where possible, to maximise the loose material at the surface and provide a more biodiverse design and natural appearance.

21. Furthermore, there is a gap that has opened in between two of the existing sheet-piled retaining walls at the western end of the campshed and it is proposed to fill this with rock bags and local fill material.

22. Only those lengths of the timber revetment that have failed will be repaired. There are no plans to replace the entire revetment.

23. The proposed works do not include or facilitate future vessel mooring or consist of any alteration to the use or function of the historical pier.

Consultation

Statutory Consultation

24. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents and other stakeholders in line with statutory duties. Statutory Consultee responses are provided below (summarised).

25. Environment Agency: No objection subject to informative.

26. Port of London Authority: - Prior to any works taking place a River Works Licence (RWL) will be required with the PLA. This requirement must be added as an informative as part of any forthcoming planning permission. For information the applicant is in contact with the PLA's Statutory Consents and Compliance Team with regard to obtaining a RWL. The PLA have no further comments to make on the planning application.

    [*Officer Note: The Applicant has confirmed that notice, with a description of the works and drawings was sent to the PLA on 28/08/24*].

27. Network Rail: No objection subject to informative.

28. Historic England: supports the application on heritage grounds.

29. GLAAS (Historic England Archaeology): No objection subject to condition requiring a Written Scheme of Investigation (WSI).

30. LB Southwark: No comment.

31. City of London Air Quality Officer: No objection subject to conditions requiring the contractor to sign up to the Non-Road Mobile Machinery Register.

32. City of London Environmental Health Officer: No objection subject to conditions requiring a scheme to protect neighbours during construction and the requirement for the contractor to sign up to the Non-Road Mobile Machinery Register.

33. Copies of the representations are attached in full to this report.

Neighbour/Third-Party Consultation Responses

34. The planning application was advertised on site (23rd September 2024) and in the press (1st November 2024). Neighbouring occupiers located in the immediate vicinity at Fishmongers' Hall (Steward's Flat, Clerk's Flat) were consulted on an individual basis (23rd September 2024).

35. 61 representations have been received from the public consultation all of which object to the proposals. These include representation from individual members of the public as well as the River Residents Group and Society of Thames Mudlarks & Antiquarians.

36. Copies of the representations are attached in full to this report.

37. The representations covered the broad themes of (a) impact on archaeological / historic matters; (b) noise and light pollution; and (c) impact on natural habitats.

38. The table below summarises the public representations received:

Principal Themes	Nature of representations (Sample)	Number of comments on this theme	Response
Impact on Archaeological and Historic matters	Example 1 (extract): This area is of significant archaeological importance. Developing on this site would cause a huge loss of artifacts currently being found at this site of the foreshore which are important to understanding London's history and public knowledge.	61	An Archaeological Desk Based Assessment has been submitted to accompany the application and Historic England are satisfied with the outcome subject to a condition.

	2. The narrow alley ways would become a thoroughfare and a place to loiter, for the venue's customers which would make it unbearable for the residents of Bolt Court given the layout of the courtyard. Such a venue should not be located near residential buildings. Example 2 (extract): I object to the destruction of this historical site known as Rome without further research and investigation. Example 3 (extract): This MUST NOT go ahead. This particular spot is of archaeological importance and is a sacred site of Roman and many other historical relics at this area in particular. Doing so would be losing history forever and also damaging the foreshore beyond repair. There is already signs that it is eroding and this will hasten the issue. Please think this through properly. It isn't wanted or needed when there are so many other places for people to enjoy themselves. Please don't ruin the environment. Thank you for your time.		Please refer to the Archaeology section of the report (Para: 72). The example responses provided also elude the potential use of the pier (i.e. for the mooring of a vessel) however this application solely relates to works to the river foreshore. These elements of the responses are therefore not relevant to the application.
Noise and Light Pollution	Example 1 (extract): Object to the noise, the light pollution and because it's an archaeological site that must	2	An Intertidal Phase 1 Biotope Survey and Water Framework Directive Assessment

	be protected. The foreshore is a sensitive ecological and historic site and this would be detrimental to its survival.		have been submitted in support of the application. A proposed Construction Environment Management Plan is proposed to be secured (Condition 5) to secure appropriate construction methods and prevent impact on ecology.
Impact on Natural Habitats	Example 1 (extract): …Suggested works from Planning Application detail would cause irreversible damage to the natural fabric and habitats of the foreshore which is significantly historically important and environmentally sensitive. There are a number of significant historical finds that have been recorded by the Finds Liaison Officer (Stuart Wyatt) from this stretch 'Roman' yielding foreshore which cannot be ignored and once disturbed will be lost forever. Vast parts of the foreshore and old barge beds have been continually blown out along the course of the banks -both North and South due to the Thames Clippers persistently being used in the river, such Craft were used in Sydney Harbour until they were banned due to the	3	As above. An Intertidal Phase 1 Biotope Survey and Water Framework Directive Assessment have been submitted in support of the application. A proposed Construction Environment Management Plan is proposed to be secured (Condition 5) to secure appropriate construction methods and prevent impact on ecology. Similar to the above the example responses provided also elude the potential use of the pier (i.e. for the mooring of a vessel) however this application solely relates to works to the river foreshore. These

	environmentally and ecological damaged being caused by their wakes tearing the the Harbour bed to shreds, more damage is being caused by them day by day and as a PLA registered Thames Foreshore Permit Holding Mudlark I, plus hundreds more can vouch for seeing this continued destruction along the Thames foreshore. Until you put a stop the cause of this damage from continually happening it is pointless trying to haphazardly carrying out 'quick fixes' that have not been properly consulted by the correct authorities which is not solely governed by the Corporation of London who's interest in this is to put back a walkway down to an intended mooring for a boat to be permanently moored as another unwanted Drinks/Party/Club for which the Corporation of London can claim licences to and have other funds made available to themselves…		elements of the responses are therefore not relevant to the application.

Policy Context

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

40. The City of London (CoL) has prepared a new Local Plan, the City Plan 2040, which was published for Regulation 19 consultation in the Spring of 2024 and

submitted to the Secretary of State in late Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

41. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.

42. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

43. Relevant City Corporation Guidance and SPDs includes the Thames Strategy Supplementary Planning Document (City of London, 2015).

Policy Considerations

44. The Corporation, in determining the planning application has the following main statutory duties:-
    - to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations (Section 70 Town & Country Planning Act 1990); and
    - to determine the application in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

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

46. The NPPF (2024) states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.

47. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
    a) approving development proposals that accord with an up-to-date development plan without delay; or

b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

48. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to:
a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

49. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.

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

51. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. It advises that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

52. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment, it advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage

asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

53. It goes on to advise, "In determining applications, local planning authorities should take account of:
    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and I the desirability of new development making a positive contribution to local character and distinctiveness."

Main Considerations of Application

54. In considering the application for planning permission account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

55. The principal considerations in this case are:
    - The extent to which the proposals comply with the development plan;
    - The extent to which the proposals comply with the NPPF;
    - The principle of the development;
    - The impact of the development in design and heritage terms (including indirect) to the setting of surrounding heritage assets;
    - The impact of the proposal in terms of archaeology;
    - The transport and highway impacts of the proposal;
    - The impact of the proposed development on the amenity of residential occupiers, both within and adjacent to the proposed development;
    - The ecological impacts of the proposal;
    - The impact on the development on flood risk; and
    - Consideration towards impacts upon Human Rights and Equality.

Principle of Development

56. London Plan Policy SI 14 (Waterways) sets out the strategic role and importance of waterways in London. The policy states that Development Plans and development proposals should address the strategic importance of London's network of linked waterways, including the River Thames, and should seek to maximise their multifunctional social, economic and environmental benefits. The Policy also requires that to reflect the distinctiveness of areas that specifically relate to the River Thames, relevant

Development Plans should designate, and ensure the maintenance of, Thames Policy Areas (TPAs).

57. Policy SI 17 (Protecting and enhancing London's waterways) of the London Plan sets out that development proposals that facilitate river restoration, including protecting and improving the foreshore and floodplain should be supported.

58. Local Plan Strategic Policy CS9 (Thames and the Riverside) seeks to ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding.

59. Draft City Plan 2040 Strategic Policy S17 (Thames Policy Area) echoes the above Local Plan Strategic Policy CS9.

60. The proposed development seeks alterations to the foreshore of the River Thames. The proposed works are essentially seeking to restore and enhance the campshed to its historic level, while preventing future substantial damage to the river wall. The proposal would therefore be minor in nature, represent a development that would facilitate the restoration of the foreshore and align with the general requirements of the above policies.

61. The proposal would sustain the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding. As such the proposal is considered to be acceptable in principle, according with the NPPF, London Plan Policies SI 14 and SI 17, Local Plan Strategic Policy CS9 and draft City Plan 2040 Strategic Policy S17.

Design

62. The relevant local policies for consideration are CS10, DM10.1, DM10.4, CS12, DM12.1 of the Local Plan policies and S8, DE2 of the emerging City Plan, and London Plan policies D4.

63. Local Plan Core Strategic Policy CS10 (Design) seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. Policy DM10.1 requires all developments to be of a high standard of design and to avoid harm to the townscape and public realm. These requirements are echoed in policies and S8, DE2 of the emerging City Plan.

64. The proposed works seek to physically alter the appearance of the eroded campshed and return it to historic campshed levels. The proposal would not introduce any new significant physical massing apart from the proposed rock mattress, overlaid with well-graded class 6A granular fill material (natural gravel, natural sand, crushed gravel, crushed rock etc), which would read as a continuation of the existing surrounding campshed. The semi-naturalised appearance of these materials would ensure that the proposal would read as typical river-side feature and over time this would soften as the development becomes more established within its setting.

65. The proposal would be in keeping with the surrounding foreshore character and the works would be acquiescent with the existing pier structure and river flood wall. The proposal is therefore considered to be appropriate in relation to its surroundings and have due regard to Local Policy.

66. The proposed development is therefore considered to comply with CS10, DM10.1, DM10.4, CS12, DM12.1 of the Local Plan policies and S8, DE2, of the emerging City Plan, and London Plan policies D4.

Heritage and Strategic Views

Impact on Setting of Listed Buildings

67. The application site is not within any national or internationally designated sites of heritage conservation importance. There are several listed buildings located within the immediate vicinity of the site. The Grade II* Fishmonger's Hall is located approximately 56m to the northeast and the eastern tower of the twin Grade II towers at Cannon Street Station, is approximately 64m to the west.

68. The proposed development is minor in nature and located away from these listed buildings on the River Thames foreshore which would, at various times, be submerged. The proposal would not block or obscure the view of the towers or Fishmonger's Hall; or detract from their pre-eminence and setting on this part of the Thames. The proposal, therefore, is not considered to cause any harm or impact to the significance or setting of the listed buildings.

The London View Management Framework (LVMF)

69. For completeness, the proposal has been considered in relation to the LVMF and other Strategic Views (including the World Heritage Site).

70. The campshed falls within View 11A (London Bridge), from where there are views upstream of the bridge towards St Paul's Cathedral and the listed towers of Cannon Street station. From Viewpoint 11A, the campshed would

be seen at low tide but is to the side of the main view towards St Paul's. As a semi-naturalised feature within the riverbed, any changes are not considered to be significant in the context of the views from London Bridge. This is particularly pertinent as the campshed itself is below the waterline for large periods.

71. The proposal is considered to accord with the guidance for this view (para 195 and 196 of the LVMF) in the manner in which it does not block or impair views of landmarks including St Paul's Cathedral or Cannon Street Station Towers.

Conclusion on Heritage

72. The proposal would preserve the settings and significance of all relevant designated or non-designated heritage assets and would accord with policies CS12 (1) and DM12.1 (1) of the Local Plan 2015 and S11 (2) and HE1 of the emerging City Plan 2040.

Archaeology

73. Section 16 of the NPPF and Policy HC1 of the London Plan require the conservation of archaeological interest as part of the planning process. Paragraph 200 of the NPPF obliges applicants to provide an archaeological assessment when development may affect heritage assets of archaeological significance.

74. Local Plan Core Strategic Policy CS12 (Historic Environment) requires developments to conserve or enhance the significance of the City's heritage assets and their settings by protecting and promoting the evaluation and assessment of the City's ancient monuments and archaeological remains and their settings, including the interpretation and publication of results of archaeological investigations. Policy DM12.4 (Ancient monuments and archaeology) goes on to require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. These requirements are echoed within policies S11 and HE2 of the Draft City Plan 2040.

75. London Plan Policy HC1 (Heritage conservation and growth) requires development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

76. The application site does not contain any Scheduled Ancient Monuments and does not lie within a Designated Archaeological Area as defined in the Scheduled Ancient Monuments & Archaeological Areas Act 1979. The proposed development site is within the historic core of the City of London, an area recognized for its significant archaeological potential and as such an Archaeological Desk-Based Assessment has been submitted in support of the proposals.

77. The assessment states that the application site lies within the course of the River Thames, between high and low water. The site has been part of a dynamic hydrological system since the last Ice Age and has never been dry land. Until comparatively recently, the 16th century, the site was always submerged.

78. The subject site lay deep in the river until the late mediaeval period when the advancing waterfronts meant the site became part of the intertidal zone. It would have been crossed by numerous short lived timber structures, such as fish traps, jetties, mooring posts, gantries and other shipping aids which were recorded in a 2019 walk-over survey of the site.

79. The Archaeological Desk-Based Assessment therefore concludes that there is a low potential for significant archaeology in the area. The majority of potential archaeology is likely to be items such as timber structures, such as fish traps, jetties, mooring posts, gantries and other shipping aids from the 16th century. Furthermore, the proposed works would not entail substantial ground disturbances as it is proposed that any imported fill would effectively be sealed by a proposed rock mattress.

80. The Greater London Archaeological Advisory Service (GLAAS) have reviewed the submitted assessment and accepted the outcome of the documentation subject to a condition requiring the submission of a written scheme of investigation (WSI) prior to any development taking place. This WSI would include a programme and methodology of site investigation and recording; a programme and methodology for an archaeological foreshore survey; and a programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

81. This WSI would therefore essentially safeguard the archaeological interest on this site and provide clarity on what investigations are required, and their timing in relation to the development programme.

82. It is noted that the majority of responses received from the third-party consultation process are specifically regarding the archaeology potential of the site and in particular the potential for Roman artifacts. While excavations

to the north of the waterfronts have revealed a significant number of lavish and elaborate Roman masonry buildings which would have dominated the approach to Londinium from the Thames, the foreshore itself site lay within the deep waters at the middle of the Thames during the Roman period. The foreshore has also now somewhat eroded from its former prevalence with a large amount of the foreshore now dissipated into the Thames (hence the basis for the application). The proposed works seek to protect the foreshore from further erosion, preventing the loss of existing foreshore and restore the historic campshed bed level. Notwithstanding this however, the proposed condition would ensure appropriate investigation of the remaining foreshore area and as such considered acceptable by Officers, GLAAS and Historic England.

83. The proposed development is therefore considered to comply with relevant policies, including Local Plan DM12.4, Draft City Plan 2040 HE2, and London Plan HC1, subject to the recommended archaeological condition.

Transport, Highways and Air Quality

84. Policy DM16.1 of the Local Plan 2015 states that development proposals which are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation in particular addressing impacts on: road dangers; pedestrian environment and movement; cycling infrastructure provision; public transport; and the street network.

85. The proposed development relates to remedial works to the River Thames foreshore and such the transport implications of the completed development would be negligible given the nature of the application (i.e. there is no requirement for parking/cycle parking/post construction servicing).

86. In terms of potential works during construction, works are expected to be carried out from the river using barge-mounted equipment (crane, 360° excavator). These works would need to be undertaken at low tide to enable full access and to minimise disturbance to the riverbed and dispersion of sediments. The submitted documentation states that where required, personnel may be required onto the foreshore if it is deemed safe to do so; however, this is likely to be limited. The details of this would be secured through a condition requiring the submission of a Construction Environmental Management Plan (CEMP).

87. Subject to the proposed mitigation measures, which would be secured by condition, the proposal is considered to be in line with DM16.1 of the Local Plan 2015.

88. With regard to Air Quality, Local Plan Policy CS15 requires developments to positively address air quality concerns. The Draft City Plan 2040 (Policy DE1) mandates that developments meet London Plan requirements for carbon emissions and air quality, while Policy HL2 requires developments to be at least Air Quality Neutral, encouraging the use of non-combustion technologies. London Plan Policy SI1 focuses on improving air quality across London, with an emphasis on Air Quality Neutrality and Positive contributions.

89. The City's Air Quality Officer has reviewed the proposed development and is satisfied with the proposal providing that during construction the applicant follows best practices to limit emissions from Non-Road Mobile Machinery (NRMM).

90. With the recommended conditions and mitigation measures, the proposed development is expected to have minimal negative impact on local air quality. The scheme complies with Local Plan Policy CS15, Draft City Plan 2040 (Policies DE1 and HL2), and London Plan Policy SI1.

Impact on Residential Amenity

91. Local Plan Policies CS21 (Housing) and DM21.3 ('Residential Environment') and draft City Plan policies S3 and HS3, requires amenity of existing residents in identified residential areas to be protected.

92. Local Plan policy DM15.7 and Draft City Plan policy HL3 require noise pollution to be considered.

93. Local Plan policy DM10.7, draft City Plan policy DE8, and London Plan policy D6 considers impact of development on existing daylight and sunlight of residential properties.

94. The proposed development represents remedial works to the foreshore and as such does not propose significant structures or have residential amenity implications. The works would be located on the foreshore and shielded from the properties on Oystergate Walk from the existing river wall.

95. The nearest residential properties, located in at Fishmongers' Hall (Steward's Flat, Clerk's Flat) would not be impacted unduly by the development given the separation distance (55m+) and minor nature of the works. Equally the properties located in LB Southwark on the southern side of the river are located some 200m from the development and as such would not be impacted unduly.

96. While, with every development, there may be noise from construction given the minor nature of works this is not considered to be significant and would be for a temporary period. With that being said, given the potential noise/disturbance a condition is proposed requiring the submission of details of a scheme to protect surrounding properties during the construction phase. The proposal is therefore considered to accord with the Local Plan and Draft City Plan policies in this regard.

Ecological Impacts and Biodiversity Net Gain

97. Ecological Impacts

98. Chapter 15 of the NPPF relates to preserving and enhancing the natural environment. The protection and enhancement of the environment is one of the three overarching objectives that define sustainable development.

99. Policy CS15 of the adopted City Plan (2015) paragraph 4(vi) states the need to enhance biodiversity and provide for its conservation and enhancement, particularly for the City's flagship species and the City's priority habitats. Policy OS3 of the draft City Plan 2040 requires development to incorporate measures to enhance biodiversity, including measures recommended in the City of London Biodiversity Action Plan (BAP, 2021) in relation to particular species or habitats and action plans.

100. Policy DM19.2 (Biodiversity and urban greening) of the adopted City Plan (2015) states that developments should promote biodiversity and contribute to urban greening as well as identifying several Sites of Importance for Nature Conservation (SINCs).

101. The application site is not located within any national/international designated sites for ecological value, although locally the site is designated within a Site of Metropolitan Importance to Nature Conservation (SINCs) and the closest Local Nature Reserve is Russia Dock Woodland located 3.36km away from the site.

102. Sites of Importance to Nature Conservation (SINCs) are locally designated areas which are recognised as being of particular importance to wildlife and biodiversity. Although a non-statutory designation, SINCs are afforded a high level of protection within the planning system. Sites of 'Metropolitan Importance' are designated by London Plan Policy G6 and are considered to contain the best examples of London's habitats.

103. An intertidal Phase 1 and Preliminary Ecological Appraisal, incorporating UK Habitat Classification, of the Riverbank House Campshed has been submitted in support of the application.

104. The assessment identified three biotopes (“Barren littoral coarse sand”, “Littoral mixed sediments “Littoral mixed sediment” and “Artificial littoral coarse sediment”) in the site, none of which qualify for legal habitat protection.

105. Furthermore, the report confirms that there are records of nesting Lesser black-backed gull (Larus fuscus), an Amber listed in Birds of Conservation Concern 4, located 0.089km from the site. Therefore, it is recommended that any works involving deconstruction of the existing campshed retaining wall should either commence outside of the breeding bird season (March-August, inclusive) or have an on-site ecologist check for nests. A condition is proposed to ensure a Construction Environmental Management Plan (CEMP) is submitted to secure the above requirements.

106. In terms of the impact on the Thames as an actual body of surface water, a Water Framework Directive Assessment has been submitted in support of the application. The document states that the works would result in small-scale local changes in flow, with negligible impacts in the main channel. The risk of sediment suspension, scour and accumulation is low and is proposed to be mitigated against through various biosecurity measures included in a CEMP to avoid the introduction or spread of invasive non-native species in the estuarine environment. This is essentially done by ensuring that the rock mattresses and fill material have been checked and treated using appropriate biosecurity measures prior to installation.

107. Policy G6 (Biodiversity and access to nature) states that where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: 1) avoid damaging the significant ecological features of the site 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site 3) deliver off-site compensation of better biodiversity value.

108. The proposal represents a repair to the existing flood defence for the Thames and wider London. The significant need for the work would provide wider benefit in terms of the repair and retention of the existing flood defence. Furthermore, the submitted documents confirm that no significant impacts to the SINC would be caused, and the proposal would not see the significant loss of specific habitat. Given the further conditions would secure this, the proposal is therefore considered to be consistent with the general requirements of Policy G6 of the London Plan.

109. The Environment Agency has reviewed the documentation and as such considered the proposal acceptable. An Informative is recommended regarding the need for a Flood Risk Activity Permit which sits outside of the Planning Act.

110. <u>Biodiversity Net Gain</u>

111. In accordance with the NPPF, local policy drivers and recent legislative changes, proposals are expected to provide measurable net gains in

biodiversity. These should aspire to a minimum of 10% net gain in biodiversity which should be evidenced through the submission. Applications should aim to quantify the predicted change in ecological value of the site in light of the proposed developments to assess compliance against local and national policy. The BNG mandate set out in the Environment Act 2021, states that a target of 10% net gain in biodiversity should be reached, and biodiversity value maximised on site.

112. The Applicant has submitted a Biodiversity Net Gain metric calculation showing that the 10% is to be reached on site. Proposed habitat creation includes the introduction of natural rock mattress and artificial rock pools on site which would assist in the delivery of ecological gains. Under these proposals the development stands to result in a net gain of 20.74% in ecological value associated with area-based habitats and as such Biodiversity Net Gain is therefore considered to be achieved on site in line with the statutory requirements of The Environment Act 2021.

113. As per the above act, if the proposed development includes 'significant' onsite enhancements, the application will need to describe how it will maintain and monitor the habitat enhancement within a Habitat Maintenance and Monitoring Plan. For the City of London significant enhancements are likely to include (but are not limited to) biodiverse green roofs, urban trees and intensive green roofs. The proposed development's biodiverse gains are essentially provided by the materiality that would be used (i.e. the rock mattress/intertidal sediment/etc) and as such is not considered to constitute a 'significant' enhancement. With that being said, a completed Landscape and Ecological Management Plan (LEMP) would be required for all non-significant onsite gains. A condition is therefore proposed securing the LEMP which would cover all relevant habitats within the Biodiversity Gain Metric and provide details of when and how the habitats are monitored, who is responsible and how and when the measures would be secured for at least 30 years.

114. Conclusion

115. Subject to the proposed mitigation measures, which would be secured by condition, the impact upon wildlife and ecology is considered to be acceptable, in line with the NPPF, Policy C15 of the City Plan, G6 of the London Plan, the City Biodiversity Action Plan and Policy OS3 of the emerging draft City Plan 2024.

Flooding and Flood Risk

116. Chapter 14 of the NPPF relates to meeting the challenge of climate change, flooding and coastal change. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

117. Local Plan Policy DM 18.1 (Development in the City Flood Risk Area) states that where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that the site is suitable for the intended use, in accordance with Environment Agency and Lead Local Flood Authority advice.

118. The application site is located within Flood Zone 3b. Flood Zone 3b (Functional Floodplain) comprises of land where water has to flow or be stored in times of flood.

119. The application relates to the foreshore and flood wall repair works and as such essentially constitutes a restoration of an existing flood defence rather than a new development within the flood zone. The site would be submerged for long lengths of time and the without the works being carried out there is the potential for the significant weakening of the flood wall, which would be contrary to the general aim of the NPPF.

120. Furthermore, under the NPPF Guidance 'Flood control infrastructure' is defined as a water-compatible development. The guidance goes on state that within Flood Zone 3b only the water-compatible uses should be permitted in this zone. As such the proposal is considered to be an appropriate use within the flood zone. This is again particularly pertinent as the campshed itself is below the waterline for large periods.

121. On this basis, given the requirement to protect the existing flood defence, the proposal is therefore considered to be compliant with the NPPF, Local Plan policy CS18 and the London Plan policy SI 13.

Public Sector Equalities Duty

122. When considering proposed development, the Public Sector Equality Duty requires the City of London Corporation to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

123. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act.

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

124. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

125. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

126. It is the view of officers that a decision to grant permission, subject to appropriate conditions, would not disadvantage those who are protected under the Equality Act 2010.

127. In relation to policy GG1 of the London Plan, the proposals are considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

128. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

129. Officers have given consideration towards the interference with the right to respect for one's private and family life (Article 8 of the ECHR) or peaceful enjoyment of one's possessions (Article 1 of Protocol 1), including by causing harm to the amenity of those living in nearby residential properties. Officers have assessed the level of harm that would result to neighbouring amenity to be acceptable subject to the recommended conditions, and therefore do not consider the proposal would result in an infringement of the ECHR as a result of the proposal.

130. Therefore, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR as a result of refusal of planning permission.

Conclusions

131. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the National Planning Policy Framework, and the emerging Local Plan and all other material considerations have been considered.

132. The proposed application seeks to remedy the current urgent issue of erosion to the foreshore in this area which is a requirement of the Environment Agency as further erosion could have significant impact to the existing river wall if left unmanaged.

133. The proposal is considered to sustain the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding and as such the proposal is considered to be acceptable in accordance with the NPPF, London Plan and draft City Plan 2040.

134. The appearance of the proposed development would be modest and for most of the time be submerged below the waterline. When viewable the proposal would not look out of character within the existing foreshore and have no harm upon surrounding heritage assets.

135. A proposed condition would secure an appropriate programme and methodology of future archaeological site investigations and recordings prior to any development taking place, in line with Historic England and GLAAS advice.

136. The impact upon residential amenity, transport, air quality, wildlife and ecology is considered to be acceptable, in line with relevant policies, subject to the recommended conditions.

137. Overall, therefore, the proposals are considered to accord with the development plan. When taking all other material considerations into account, subject to the recommendations of this report it is recommended that planning permission be granted.

APPENDIX A: BACKGROUND PAPERS

Plans titled:

Location Plan
2401-BRL-02-XX-DR-C-0001 Rev T01
2401-BRL-02-XX-DR-C-0002 Rev T01
2401-BRL-02-XX-DR-C-0003 Rev T01
2401-BRL-02-XX-DR-C-0004 Rev T01
2401-BRL-02-XX-DR-C-0004 Rev T01
2401-BRL-02-XX-DR-C-0006 Rev T01
2401-BRL-02-XX-DR-C-0007 Rev T01
2401-BRL-02-XX-DR-C-0009 Rev T01
2401-BRL-01-XX-SK-C-0001 Rev P01

Documents titled:

Archaeological Desk-Based Assessment (Mills Whipp Projects June 2024)
Intertidal Phase 1 Biotope Survey (Thomson Environmental Consultants July 2024)
Riverbank House campshed repairs Description of work (City of London – Applicant)
Water Framework Directive Assessment Riverbank Campshed (Thomson Environmental Consultants September 2024)
REGULATION 64(2) HANDLING NOTE (22 Jan 2025)
Biodiversity Net Gain Metric

List of objections 24/00938/FULLR3

- Angela Bridge
- Charlie Dixon
- Dr Alessio Checconi
- Dr Flora Dunster
- Dr Flora Spiegel
- Dr Lucy Peel
- Ed Bucknall
- Heidi Daish
- Jenny Ridgwell
- Miss Agnieszka Targonska
- Miss Claire Russell
- Miss J Pearce
- Miss Josephine Cook
- Miss Lesley McDonnell
- Miss Lucy Sladdin
- Miss Marie-Louise Plum
- Mr Angus Stewart
- Mr Duncan John
- Mr G Phillips
- Mr Gabriel Buttimore
- Mr Garry Marsland
- Mr Howard Sinden
- Mr Jack Engeham
- Mr Jack James
- Mr Jaime Rory Lucy
- Mr John Sinden
- Mr Kevin Cox
- Mr Liam Sharpe
- Mr Mark Sowden
- Mr Richard Hemery
- Mr Richard Potts
- Mr Rob Wonnacott
- Mr Scott Wescombe
- Mr Sean Clarke
- Mr Stephen Engeham
- Mr Stuart Picknell
- Mr Tim Miller (Society of Thames Mudlarks & Antiquarians)
- Mrs Alison Picknell
- Mrs Billie Bond
- Mrs Elzbieta Anderson

- Mrs Esther Cook
- Mrs Gail Howell
- Mrs Helen Marsland
- Mrs Kerry Hoppett
- Mrs Maarina Budd
- Ms Amy Holroyd
- Ms Amy Sinden
- Ms Caroline Nunneley
- Ms Ellen O'Keeffe
- Ms Gemma Duncan
- Ms Julie Johns
- Ms Monika Buttling-Smith
- Ms Rachel Walters
- Ms Shelley Murray
- Ms Susan Thompson
- Ms Susan Tomlin
- River Residents Group (Michelle Lovric)
- Sam Caethoven
- Sherry Babbitt
- Suzanne Toman
- Tony Smith

List of Statutory or Other Consultee Responses

- Air Quality Officer
- Environment Agency
- Environmental Health Officer
- Historic England
- Historic England GLAAS
- Lead Local Flood Authority
- London Borough of Southwark
- Network Rail
- Port of London Authority

APPENDIX B: Relevant Policies of the Development Plan

Relevant London Plan Policies

Policy GG1 Building strong and inclusive communities

Policy GG2 Making the best use of land

Policy SD4 The Central Activities Zone (CAZ)

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy SI 1 Improving air quality

Policy SI 13 Sustainable drainage

Policy T4 Assessing and mitigating transport impacts

Relevant Local Plan Policies

CS9 Thames and the Riverside

CS10 Design

DM 10.1 New development

DM 10.4 Environmental enhancement

CS12 Historic Environment

DM 12.1 Managing change affecting all heritage assets and spaces

DM 12.4 Ancient monuments and archaeology

CS15 Sustainable Development and Climate Change

DM 15.1 Sustainability requirements

DM 15.5 Climate change resilience and adaptation

DM 15.6 Air quality

DM 15.7 Noise and light pollution

CS16 Public Transport, Streets and Walkways

DM 16.1 Transport impacts of development

DM 16.2 Pedestrian movement

DM 16.8 River transport

DM 17.2 Designing out construction waste

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

DM 19.2 Biodiversity and urban greening

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

The Thames Strategy SPD (2015);

Protected Views SPD (January 2012)

City of London Biodiversity Action Plan (2021)

Relevant Draft City Plan 2040 Policies

Strategic Policy S1: Healthy and Inclusive City

Policy HL1: Inclusive buildings and spaces

Policy HL2: Air quality

Policy HL3: Noise

Strategic Policy S8: Design

Policy DE1: Sustainable Design

Policy DE2: Design Quality

Policy VT1: The impacts of development on transport

Policy VT3: Vehicle Parking

Policy VT4: River Transport

Strategic Policy S13: Protected Views

Policy OS2: Urban Greening

Policy OS3: Biodiversity

Policy OS4: Biodiversity Net Gain

Strategic Policy S15: Climate Resilience and Flood Risk

Strategic Policy S17: Thames Policy Area

	SCHEDULE: CONDITIONS
1.	**Time Limit** The development hereby permitted shall be begun before the expiration of three years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990
2.	**Approved Plans** The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: Dwg nos Location Plan, 2401-BRL-02-XX-DR-C-0001 Rev T01, 2401-BRL-02-XX-DR-C-0002 Rev T01, 2401-BRL-02-XX-DR-C-0004 Rev T01, 2401-BRL-02-XX-DR-C-0007 Rev T01, 2401-BRL-02-XX-DR-C-0009 Rev T01 and 2401-BRL-01-XX-SK-C-0001 Rev P01. REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.
3.	**Archaeological Written Scheme of Investigation** No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. The programme and methodology for an archaeological foreshore survey C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI. REASON: To ensure an opportunity is provided for the archaeology of the site to be investigated and recorded in accordance with the following policy of the Local Plan: DM12.4

4.	**Scheme For Protecting Nearby Residents** Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
5.	**Construction Environmental Management Plan (CEMP)** Prior to the commencement of the development, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved by the local planning authority. The CEMP shall include (but not limited to) details of: - The method of construction; - Biosecurity measures to prevent the introduction of contaminants or spread of any Invasive non-native species (INNS) within any required materials; and - Measures protecting locally and nationally protected species of conservational concern during construction. The demolition and construction works shall be carried out in accordance with the approved plan. REASON: To ensure that construction works do not have an adverse impact on public safety, the transport network and the environment in accordance with London Plan Policies T7 and G6 and the following policies of the Local Plan: DM15.6, DM16.1 and DM 19.2. These details are required prior to construction work commencing in order that any impact is minimised from the time that construction starts.
6.	**Non-Road Mobile Machinery Registration** Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery

	Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
7.	**Biodiversity Net Gain Plan** Notwithstanding the details shown on the approved plans and set out in the supporting information, details of all Biodiversity Net Gain shall be submitted to and approved in writing by the local planning authority prior to above ground works. Details shall include: a) Completed Biodiversity Net Gain Plan b) Completed statutory metric with the Pre-development and post-development habitat values. The development shall then be carried out in accordance with these approved details. REASON: In the interest of ensuring there is no net loss of habitats, no harm to species populations and to ensure the provision of biodiversity gain in accordance with the requirements of Schedule 7A of the Town and Country Planning Act 1990, the NPPF, London Plan policy G6 and Local Plan policy CS15 and DM 19.2.
8.	**Landscape and Ecological Management Plan (LEMP)** The development hereby permitted shall not commence until a detailed Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. The plan should include: (a) details of proposed habitat enhancement/creation measures; (b) management details of any proposed habitat enhancement; and (c) details of how these habitat enhancement/creation measures would be secured for at least 30 years. Such approved measures shall thereafter be implemented in full. Reason: To ensure a net biodiversity gain in accordance with Schedule 7A of the Town and Country Planning Act 1990, the NPPF, London Plan policy G6 and Local Plan policy CS15 and DM 19.2.

Informatives:

1.	**NPPF** In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways: • detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available; • a full pre application advice service has been offered; • where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
2.	**Good Archaeological Practice** The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
3.	**Environment Agency Regulations** The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: o on or within 8 metres of a main river (16 metres if tidal) o on or within 8 metres of a flood defence structure or culvert including any buried elements (16 metres if tidal) o on or within 16 metres of a sea defence o involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert o in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits or contact our National Customer Contact Centre on 03702 2 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.
4.	**River Works Licence (RWL)** The applicant is reminded that prior to any works taking place a River Works Licence (RWL) will be required with the Port of London Authority.

5.	**Network Rail** The developer must ensure that their proposal, both during construction and after completion does not: o Encroach onto Network Rail land o Affect the safety, operation or integrity of the company's railway and its infrastructure o Undermine its support zone o Damage the company's infrastructure o Place additional load on cuttings o Adversely affect any railway land or structure o Over-sail or encroach upon the air-space of any Network Rail land o Cause to obstruct or interfere with any works proposed works or Network Rail development both now and in the future.

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Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: [redacted]

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 26 September 2024
Our Ref 24/05552/NPLN
Your Ref 24/00938/FULL

Subject River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions be attached to any consent:

Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Regards

[redacted]

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: [redacted]

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0043

Date of issue of this decision: 08/10/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0043	**Date of Issue of Decision:** 08/10/2024
Your Ref No.:	

Applicant Alex Thwaites City Planning
City of London

NO COMMENTS made in reference to your consultation on the following development:

Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts.
Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

At River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

In accordance with your letter received on 3 October 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Historic England

Mr Alex Thwaites [redacted]

City of London Corporation

Planning Department

Our ref: P01583123

10 October 2024

Dear Mr Thwaites

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

RIVER FORESHORE ADJACENT TO RIVERBANK HOUSE SWAN LANE EC4R 3BF
Application No. 24/00938/FULL

Thank you for your letter of 23 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The Thames foreshore as a whole is a sensitive and important archaeological site, particularly when considered within the City of London Archaeological Priority Area (Tier I). The proposal is also situated adjacent to the Fishmongers' Hall scheduled monument and grade II* listed building.

The current campshed in this location is failing and needs replacement in order to ensure the preservation of the foreshore in this location. Therefore, we consider that the works would have a beneficial impact on the archaeological resource here. We also think that there would be no adverse impact to the significance of Fishmongers Hall.

The National Planning Policy Framework is clear that heritage assets are an irreplaceable resource, and states the requirement for conservation in a manner appropriate to the assets significance (para 195 and 205), with harm to heritage

significance to be avoided or minimised (para 201), and for any remaining harm to be clearly and convincingly justified (para 206).

The applicant has discussed the proposals with us prior to submitting this application, and we are satisfied that the potential for harm to archaeological remains is minimised by the proposals and could be appropriately controlled through conditions; i.e. for an agreed archaeological strategy which is informed by a walk-over survey.

Recommendation

Historic England supports the application on heritage grounds.

We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 201, 205, 206.

Should you be minded to grant permission for these works, we would recommend that it includes a condition specifying that no groundworks can commence until a programme of archaeological works has been secured through the provision and agreement of a written scheme of investigation.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Christina Reade

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Historic England

Inspector of Ancient Monuments

[redacted]

cc Helen Hawkins (GLAAS)

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Historic England

Alex Thwaites
Planning and Environment Department
City of London
Guildhall

Your Ref: 24/00938/FULLR3
Our Ref: 225034

Contact: Helen Hawkins
[redacted]

15 October 2024

Dear Alex,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles

Recommend Archaeology Condition

Thank you for your consultation received on 10 October 2024.

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

Assessment of Significance and Impact

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

An archaeological desk-based assessment has been provided with the planning application (Mills Whipp 2024). The desk-based assessment highlights that although the majority of the work proposed will be carried out to protect the foreshore from further erosion, the placement of rock mattresses over the foreshore will obscure any archaeological remains of post-medieval date that survive. A previous foreshore recording project was carried out in 2019, which covered part of the application area. This recording identified a number of post-medieval structures of interest located on this part of the foreshore.

Some of the works proposed include the removal of earlier riverbank structures, which may entail limited localised excavations. The need for and extent of excavations is currently unknown.

As outlined in the DBA, it is therefore recommended that the applicant undertake an archaeological walk-over survey, to encompass the entire width of the foreshore, and extend further downstream towards London Bridge and the base of Fishmonger Stairs for the c.50m that may be exposed at low tide, and upstream for a similar distance towards All Hallows Lane. The foreshore survey should be undertaken over two low tide windows in order to ensure full coverage of the visible archaeological resource.

Depending on the need for any excavations, the foreshore survey should be followed by the excavation of small trial pits, augering and the retrieval of timbers if appropriate. An archaeological Watching / Stopping Brief should be undertaken during demolition to record any archaeological features revealed.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

Condition — No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. The programme and methodology for an archaeological foreshore survey
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

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

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk
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Correspondence or information which you send us may therefore become publicly available.

I envisage that the archaeological fieldwork would comprise the following:

Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

The need for a watching brief will be dictated by the development programme and an assessment of proposed impacts. The watching brief may also require excavation of small trial pits, augering and the retrieval of timbers

Foreshore Survey

A foreshore survey should be carried out for the site and its wider area. The survey should identify where remains have been changed or lost since the previous survey in 2019 and record any new remains prior to the rock mattresses being inserted.

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

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

Yours sincerely

Helen Hawkins

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

From: [redacted]
To:
Subject: Network Rail Consultation Response for 24/00938/FULL - River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
Date: 15 October 2024 15:49:35
Attachments: image001.png

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OFFICIAL

Dear Planning,

Network Rail Consultation Response: 24/00938/FULL - River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

Thank you for consulting Network Rail on the above planning application.

Due to the close proximity of the proposed works to Network Rail's land and the operational railway, Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

The developer must ensure that their proposal, both during construction and after completion does not:
• encroach onto Network Rail land
• affect the safety, operation or integrity of the company's railway and its infrastructure
• undermine its support zone
• damage the company's infrastructure
• place additional load on cuttings
• adversely affect any railway land or structure
• over-sail or encroach upon the air-space of any Network Rail land
• cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Should you wish to discuss any of the above, please contact our Asset Protection team via AssetProtectionLondonSouthEast@NetworkRail.co.uk.

Kind regards,

Seda Guillen Izuma
Town Planning Technician
Network Rail Property (Southern)
A 1 Puddle Dock, London, EC4V 3DS
E [redacted]
W www.networkrail.co.uk

****
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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

****
****

From: [redacted]
To:
Cc:
Subject: Port of London Authority Response (DC 365) Plan ref: 24/00938/FULL River foreshore adjacent to Riverbank House
Date: 17 October 2024 14:53:50

THIS IS AN EXTERNAL EMAIL

FAO: Alex Thwaites

Dear Alex

Please see below for the Port of London Authority's (PLA) comments on the above-mentioned application at the river foreshore adjacent to Riverbank House Swan Lane, for:

The proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles. |

It is disappointing that the PLA have not been directly consulted on the planning application. Related to this as the redline boundary for the application extends into the Tidal Thames, it is also considered that formal notice should have been served on the PLA.

With regard to the proposed development itself to highlight that prior to any works taking place a River Works Licence (RWL) will be required with the PLA. This requirement must be added as an informative as part of any forthcoming planning permission. For information the applicant is in contact with the PLA's Statutory Consents and Compliance Team with regard to obtaining a RWL.

The PLA have no further comments to make on the planning application.

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority
[redacted]

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creating a better place
for people and wildlife

Environment Agency

Alex Thwaites
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137464/01
Your ref: 24/00938/FULLR3

Date: 17 October 2024

Dear Alex,

River Foreshore Adjacent to Riverbank House, Swan Lane, EC4R 3BF

Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.

Thank you for consulting us on the above planning application on 23 September 2024.

Environment Agency Position
Based on a review of the submitted information**, we have no objection** to the proposal, however, please consider the following advice.

Informative
Please include the below informative for any permission granted.

Flood Risk Activity Permit
The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert **including any buried elements** (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702

422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to Applicant and Local Planning Authority

Intertidal Foreshore
The application proposes the installation of new sloped revetment formed from imported granular fill and rock mattresses. We strongly encourage more ecologically beneficial solutions are explored. The collapse of the existing campshed has created conditions which benefit the intertidal foreshore, including nearby intertidal mudflat, habitat which is listed as a Biodiversity Action Plan (BAP) priority habitat. This habitat is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006.

We therefore strongly recommend the applicant considers alternative options that involve a more ecologically beneficial solution within the Thames. These could include but are not limited to retaining walls running parallel to the existing line of timbers and/or perpendicular to the flood defence or timber fronted steel sheet piling. Any softer approaches must still protect the tidal flood defence from scour, as well as stabilise and protect the toe of the existing defences.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please do not hesitate to contact me on HNLSustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 11 October 2024
Our Ref DS/SUDS24/00054
Your Ref PT_AZT/24/00938/FULL
Subject River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority understands that the planning application does not constitute a major development. In accordance with the written ministerial statement and the Local Plan under which the Lead Local Flood Authority acts, we do not consider this application to fall within our remit. We did not need to be consulted on this application and therefore have no comments.

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Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
Address: River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
Proposal: Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.
Case Officer: Alex Thwaites

Customer Details

Name: Miss Marie-Louise Plum
Address: Flat 1 304 West End Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the proposed plans as I have concerns that the historical and archaeological significance of this site hasn't been adequately considered in the historical report. I would like to see further investigations and careful consideration of this highly significant archaeological site.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
Address: River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
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Case Officer: Alex Thwaites

Customer Details

Name: Ms Monika Buttling-Smith
Address: 71 Nightingale Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this proposal as I believe it will cause damage to a historic stretch of foreshore and bury countless important Roman artefacts.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Sherry Babbitt
Address: 1900 JFK Blvd Apt 324 Philadelphia

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a holder of a Thames Foreshore Permit, I object to going forward with the proposed Swan Lane development without first providing for a comprehensive survey of the site's historical and archaeological significance and deferring this application until the proper consultation and investigation shall be undertaken.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Mark Sowden
Address: 15 Upper Walthamstow Road Walthamstow London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I regularly visit the foreshore at the proposed site, searching for material evidence of London's past under the conditions of a Port of London Standard Thames foreshore permit. The site has eroded significantly in the past few years revealing a new layer that we believe to be undisturbed Roman foreshore. Evidence that this was foreshore in Roman times rather than ' the middle of the river' as stated in the desktop archaeology report, will significantly change our understanding of Roman London. The area needs to be properly surveyed by archaeologists before any building work begins. I suggest that the archaeologists liaise with the licensed permit holders to do this survey as they have detailed knowledge of the site. Finds from the site are being recorded at the Museum of London and the quantity and quality of finds proves this is a unique and special site for the study of Roman archaeology.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Sean Clarke
Address: 65 Alderney Road Slade Green Erith

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The site is of huge historical importance.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Jaime Rory Lucy
Address: 52 Reynolds House Approach Rd London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:FAO Alex Thwaites Ref: PA 24/00938/FULLR3 Swan Lane. Sir I wish to OBJECT to this proposed planning application and suggest it be deferred for further archaeological and historical investigations are undertaken.

I note that In the HA "desk based report"it states

"A review of the available evidence indicates a generally low archaeological potential for the prehistoric, Roman, Medieval, Post Medieval and Modern periods, and a possible palaeoenvironmental potential for the prehistoric periods"

As a member of LAMAS and MOLA trained TDP Foreshore Recording Observation Group member and an active PLA foreshore permit holder. I would like to bring to your attention to the fact that during the past 2 years there have been many SIGNIFICANT Roman and Late Medieval affects discovered in this location recorded on British Musems PAS database that suggest it has the potential to offer it to be afforded SAM status - with its proximity to recorded and scheduled riverfront locations. Many of the recent artefacts are due to be included and feature of a major Exhibition Curated and Hosted By London Museum Docklands in 2025 . I would like to request you consider to defer this application as it warrants further investigation as to its significance in as an important "Archeological and Historical" landmark and "conditions" are in place to safeguard and record and document all aspects before and during any proposed works.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Susan Thompson
Address: 31 South Drive Brentwood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:FAO Alex Thwaites Ref: PA 24/00938/FULLR3 Swan Lane.

Dear Sir I wish to object to this proposed planning application. Please consider deferring for further archaeological and historical investigations to be undertaken
There have been significant Medieval and Roman finds - I have witnessed them with my own eyes, over the last few months. Many I know from my connections to the Museum of London have been recorded this year. Please check the PAS website or ask the museum for verification.

I am saddened that other opportunities may be missed to record valuable historically important data.
Please reconsider.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Gabriel Buttimore
Address: 32 Longstone Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I object on the basis that the infilling of the site will significantly damage the archeological record as this is a location that has yielded many significant finds over the years.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Charlie Dixon
Address: 2 Palace Mews London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a licensed mudlark with extensive experience in this location, I object to this planning application. This is an important Roman site and countless rare artefacts have come from here and continue to do so.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Jack James
Address: 30 Waterloo Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:PA24/00938/FULL RE I'm writing to Object to the proposals in relation to works to Swan Lane. I would like to suggest that you defer this application to undertake a more robust report that reflects the Historical importance of this site. With its close proximity to London Bridge on the North Bank of the River Thames and with such levels erosion that I understand in this case is necessary to repair and restore the erosion is quite possibly to level that could be with the level that could be the Roman Strata. Recent artefacts confirmed and recorded by the London Museum are of such significance and quality and number that isn't reflected in the HA report a more uptodate report should be undertaken and considererd against advice by statuatory stake holders and afforded the protections it so richly deserves.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Dr Flora Dunster
Address: St Paul's Vicarage Kipling Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this proposal, as it promises to obscure and/or damage a site of great archaeological significance. Numerous Roman and late Medieval artefacts have been found here, many of them recorded with the MoL and included in the forthcoming mudlarking exhibition due to be held at the MoL in 2025.

Please consider deferring this application due to the archaeological importance of the site, and until conditions can be agreed upon so as to protect the fabric of this important part of the foreshore.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Amy Holroyd
Address: Flat 35 17 Sutton Court Road Sutton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Concerns regarding the potential heavy handed covering of the foreshore.

Whilst maintaining the stability of the river walls is obviously paramount, the section of the foreshore listed is a site of archeological interest and importance due to the large numbers of historical finds, particularly Roman, found in the area, many or which are om display on the London Museum or in the process of conservation there. If the above works are completed without due archaeological surveying there runs the risk of a huge loss of historically important finds and information

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Duncan John
Address: 7 Elm Road Elm Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this plan. I'm a standard foreshore permit holder. Many of us have recovered Roman items from this area that have been recorded with the Museum of London. The indications are that there is much more to learn from continued stud here. This plan risks permanently losing a unique archaeological resource. It doesn't seem that the implications have been thoroughly thought-through. The potential regrets are huge.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Sam Caethoven
Address: 3 Streamside Close Bromley

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposal threatens to destroy an important site of archeological interest. Myself and other mudlarks have discovered and recorded hundreds of important Roman finds from this location and new finds are regularly made to this day.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Liam Sharpe
Address: 48 Maynards Quay Wapping London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Archeological importance and to protect a historic site.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
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Case Officer: Alex Thwaites

Customer Details

Name: Jenny Ridgwell
Address: 27 Putney Wharf Tower London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the destruction of this historical site known as Rome without further research and investigation.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Ed Bucknall
Address: Maynards Quay Wapping London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Very important archeological site, in situ not later infill from barge beds created in the 19th century. This needs to be fully investigated and the geheric desk top reports do not over these facts in any way whatsoever. Please refer to items found and discovered over the years at this important site.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Amy Sinden
Address: 39 Mulberry Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I firmly object to this proposal. This will cause serious harm to a historically important site. I have a standard permit for the Thames foreshore and I have been mudlarking for 2.5 years. I have had 35 objects recorded on the PAS - 2 significant finds from this exact location. One is the ONLY object like this ever found and the only version to be recorded on the Portable Antiquities Scheme (PAS). The area is of great archaeological significance and should be protected not built upon or filled in. There needs to be proper preservation of this area.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
Address: River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
Proposal: Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.
Case Officer: Alex Thwaites

Customer Details

Name: Ms Gemma Duncan
Address: 41 Dominion Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The Thames foreshore in the proposed area is hugely significant to the archaeological preservation of London's history, dating back to the British-Roman period. Artifacts wash up from the Thames on each tide, and permitted mudlarks, archaeologists and historians collect and preserve these artifacts for future generations to study and appreciate.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
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Case Officer: Alex Thwaites

Customer Details

Name: Suzanne Toman
Address: 33 Heyes road Wigan

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Area of archeological interest. Roman heritage in that area.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Maarina Budd
Address: 33 Charles Street Tunbridge Wells

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Suggested works from Planning Application detail would cause irreversible damage to the natural fabric and habitats of the foreshore which is significantly historically important and environmentally sensitive.

There are a number of significant historical finds that have been recorded by the Finds Liaison Officer (Stuart Wyatt) from this stretch 'Roman' yielding foreshore which cannot be ignored and once disturbed will be lost forever.

Vast parts of the foreshore and old barge beds have been continually blown out along the course of the banks -both North and South due to the Thames Clippers persistently being used in the river, such Craft were used in Sydney Harbour until they were banned due to the environmentally and ecological damaged being caused by their wakes tearing the the Harbour bed to shreds, more damage is being caused by them day by day and as a PLA registered Thames Foreshore Permit Holding Mudlark I, plus hundreds more can vouch for seeing this continued destruction alongvthe Thames foreshore.

Until you put a stop the cause of this damage from continually happening it is pointless trying to haphazardly carrying out 'quick fixes' that have not been properly consulted by the correct authorities which is not solely governed by the Corporation of London who's interest in this is to

put back a walkway down to an intended mooring for a boat to be permanently moored as another unwanted Drinks/Party/Club for which the Corporation of London can claim licences to and have other funds made available to themselves.

This Planning Application is flawed and without the correct consultation from The Crown Estate, The British and London Museums, English Heritage, The Port of London Authority and The Society of Thames Mudlarks, no such consent on this planning permission should be given until there has been a proper consultation by all named parties.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Miss Josephine Cook
Address: 34 Bowyers Court Railshead Road Twickenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:It is outrageous to consider destroying such an important archaeological area. Do you have any idea of the amount of artefacts recovered by mudlarks on a daily basis? This is all very suspicious and has drawn a lot of attention

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Richard Potts
Address: 35a Fielding Avenue TWICKENHAM

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Please do not build on the ancient foreshore of Roman Londinium. Too much history will be lost forever. Kind regards Richard

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Esther Cook
Address: 4 Apple Tree Close Nailstone Nuneaton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is a site of historical interest and should be protected.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Caroline Nunneley
Address: 191 Preston Drove Brighton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:Object to the noise, the light pollution and because it's an archaeological site that must be protected. The foreshore is a sensitive ecological and historic site and this would be detrimental to its survival .

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Billie Bond
Address: Ronley RECKFORD ROAD Saxmundham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Area of archaeological interest

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
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Case Officer: Alex Thwaites

Customer Details

Name: Mr Rob Wonnacott
Address: 142 Waldegrave Road Teddington

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:It is a sensitive archeological site and should be protected

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Richard Hemery
Address: 26 Manor Gardens Godalming

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Damage to historic foreshore.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Helen Marsland
Address: 17 Homefield Road Old Coulsdon

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This area is of significant archaeological importance. Developing on this site would cause a huge loss of artifacts currently being found at this site of the foreshore which are important to understanding London's history and public knowledge.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Susan Tomlin
Address: 18 Belmont Court 93 Highbury New Park London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This MUST NOT go ahead. This particular spot is of archeological importance and is a sacred site of Roman and many other historical relics at this area in particular. Doing so would be losing history forever and also damaging the foreshore beyond repair. There is already signs that it is eroding and this will hasten the issue. Please think this through properly. It isn't wanted or needed when there are so many other places for people to enjoy themselves. Please don't ruin the environment. Thank you for your time.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Miss J Pearce
Address: 40 Beaconsfield Close Chiswick London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the destruction of the forshore and the history in this area.

Items of our history are regularly found by experienced licenced mudlarkers in and around this area.
These important items will be destroyed or lost forever, this would be a real shame.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Kevin Cox
Address: 43 Beechcroft Avenue Stanford-le-Hope

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Archaeological integrity is too important for development!

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Elzbieta Anderson
Address: 58 Popes Avenue Strawberry Hill Twickenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The Thames Foreshore here is one of immense archaeological significance regarding the history of London. Numerous ancient artefacts have been found in this location over many years, finds spanning the history of Roman London through to the modern day. Many of these finds are significant enough to have been reported to the Finds Liaison Officer at the London Museum and recorded on the PAS (Portable Antiquities Scheme.) There are still likely to be many more artefacts to be found in this particular area. I find it very concerning that this work is being proposed without archaeological work and assessment being undertaken first, otherwise I fear the overall archaeology of this hugely important area will be lost forever. I would urge everyone concerned to please re-think the way they are approaching this decision. Currently it appears akin to a reckless act of heritage vandalism.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Dr Alessio Checconi
Address: Vauxhall London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This proposal is affecting the only area Of London where direct evidence of its Roman origin is currently cropping out on the Thames foreshore.
The artefacts that have been retrieved form this area shed light on the life of the first settling community and the proposed works would compromised forever this archeological site.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Miss Lesley McDonnell
Address: 342a Baker Street Enfield

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I oppose this because of its historical value.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Angus Stewart
Address: Yoxford Yoxford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The area affected my the activities listed in this proposal deeply affect a site of the foreshore that has been give, including in the last year, very important historical artefacts related to founders of the City of London during the first three centuries aC.
Several of these uniques artefacts are currently with the Museum of London.
Any activity in that section of the foreshore should be planned in accordance with the necessary measures to preserve this unique archeological site and keep the current surface accessible and searchable.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Miss Claire Russell
Address: Cobweb Cottage, Scotts Corner Panxworth Norwich

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Protected archeological site

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Heidi Daish
Address: 35 Shaftesbury Road Brighton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The proposed Swan Lane development needs to be fully investigated as an important site of London's Roman Archaeology.

As a Port of London Standard Thames permit holder, I strongly disagree with the proposed plans. This development will potentially destroy countless important Roman objects. The unrecorded history of Roman London should be protected for future generations.

A detailed investigation of this special site needs to be undertaken.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Garry Marsland
Address: 17 Homefield Road Old Coulsdon

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is a site of archeological significance and should not be ruined.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Shelley Murray
Address: 6 ferns mead Farnham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I object to this development. This is clearly an important historical site & archaeological investigative is required.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Jack Engeham
Address: 16 Gilbey Avenue Bishop's Stortford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a mudlark on the Thames with familiarity with this area of foreshore, I don't belive the correct consideration has been made for the archaeological importance of this stretch in terms of mainly Roman archaeology. Finds from this area are forming the main part of the museum of London's new mudlarking exhibition and the covering up of this area without a formal archaeological intervention would result in the loss of significant archaeology

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Ellen O'Keeffe
Address: 5 mulberry court strawberry hill road Richmond upon Thames, London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Should have archaeological investigations before any building works

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Miss Agnieszka Targonska
Address: 198 A Halfway Street Sidcup

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Archeological finds from the neighbourhood suggest that this is the area of significant importance. Professional works leading to discover and safe potential Roman and medieval artefacts seems to be obvious necessity in this case. Destroying this place without further investigation would be a huge damage to the national heritage.

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr G Phillips
Address: Abbey View Gardens Bath

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the planning proposals. The site is wrongly regarded in the generic archeological planning report accompanying the application as one of little historic interest with the spot being always submerged deep in the river. Extensive ancient finds from the site (that have been extensively recorded with Portable Antiquities Scheme) strongly suggest otherwise.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Stephen Engeham
Address: 16 Gilbey avenue Bishops Stortford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the proposal. There should first be an independent archeological survey carried out prior to any such action being considered. There are significant Roman finds that continue to be found that are an important part of London's history. Filling in this area would bury the opportunity for further significant finds to be uncovered. These finds are reported on the Portable Antiquities Scheme.

Comments for Planning Application 24/00938/FULLR3

Application Summary

Application Number: 24/00938/FULLR3
Address: River Foreshore Adjacent To Riverbank House Swan Lane EC4R 3BF
Proposal: Proposed removal/cutting down to bed level of the existing campshed timbers. Removal of gabion baskets and steel tie rods between the existing campshed and anchor posts. Installation of new sloped revetment formed from imported granular fill and rock mattresses. Installation of Rock Bags in the gap that has formed between two of the sheet pile campshed retaining walls at the western end of the site. Reinstatement of the bed level behind the installed rock bags to match the top level of the sheet piles.
Case Officer: Alex Thwaites

Customer Details

Name: Tony Smith
Address: 62 Devonshire Road Walthamstow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:These are areas of public interest and should be preserved as they are

Comments for Planning Application 24/00938/FULLR3

Application Summary

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Stuart Picknell
Address: 32 Sandown Avenue Picknell Westcliff-on-Sea

Comment Details

Commenter Type: Other
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:This is of huge archaeological interest and must be preserved. The Roman artifacts test have been discovered here are second to none with dome only being in recent month's.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Scott Wescombe
Address: 15 Alexandra Road Rainham Essex Havering, London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Destruction of the foreshore that has great historical significance.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Alison Picknell
Address: 32 Sandown Avenue Westcliff

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a licenced mudlark I object to this proposal.
A number of significant Roman artefacts have been found on this stretch of the foreshore recently, giving us an invaluable insight into Roman London. Such history would be lost forever if this proposal happens.

From: [redacted]
To:
Subject: Fw: Objection to PA/2400938/FULL
Date: 18 October 2024 13:08:21
Attachments: Outlook-Descriptio

HI,

Comments for Planning Application 24/00938/FULLR3

Thanks,

Alex

Alex Thwaites MRTPI | Principal Planning Officer
Environment Department | City of London | Guildhall | London EC2V 7HH
[redacted] | www.cityoflondon.gov.uk

From: angela bridge [redacted]
Sent: 18 October 2024 1:06 PM
To: Thwaites, Alex [redacted]
Subject: Objection to PA/2400938/FULL

[You don't often get email from [redacted] Learn why this is important at [redacted]

THIS IS AN EXTERNAL EMAIL

Dear Alex,
I am writing to object to and express the concerns I have regarding the above planning application. My main concerns are that the developers are downplaying this site's historical and archaeological significance and potential, and that the methodology of the proposed works and its detrimental impact on a historical site are not being taken into account.

I'm looking to make sure all parties are aware of how important this site is and the best practice and scrutiny is observed in recognising its importance not only to London but the UK and internationally, and "conditions are set in place" to guide any works going forward so opportunities to fully investigate the site are not lost.

Regards,
Angela Bridge
8 Crescent Gardens
SW198AJ

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Gail Howell
Address: 48 Carson Road West Dulwich

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:OBJECTION
PA/2400938/FULL
I have been mudlarking for nearly 7 years at this site, and Roman artefacts can be found there. They are recorded with the PLA and contribute to our history. Let us continue to find and record these wonderful finds.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Rachel Walters
Address: 130 Gwydir st Cambridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I understand the site is of archeological importance and a proper investigation needs to take place. Unique Roman remains were found here recently

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Ms Julie Johns
Address: 12 Station Road Waterbeach Came

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the destruction of a highly valuable area of foreshore in terms of history and archaeological finds.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mrs Kerry Hoppett
Address: 8 compton road TIDWORTH

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:Historical site

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Howard Sinden
Address: 39 Mulberry Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am a sound designer and I object to this proposal as this will greatly harm an area I have come to understand has significant historical value. As well as obviously the noise pollution my main concern is the area in question has not been rightly or fully assessed. My wife (who owns a standard permit for the foreshore) has found significant artefacts from this area which are currently at the London Museum and will be exhibited early next year to the general public. This proposal would strip any future historically significant artefacts from being uncovered. I strongly object to this.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Dr Flora Spiegel
Address: 3 Woodlands Road Orpington

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This area is has significant archaeology (Roman, medieval and postmedieval) which has been inappropriately downplayed in the application and supporting documents. I am concerned that the proposed plan for the works does not adequately protect this sensitive archaeology or allow for it to be excavated properly beforehand.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Dr Lucy Peel
Address: 219 Beatrice Road Leicester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Erosion along the riverbank at Swan Lane has revealed immense amounts of archaeological information that must be imminently recorded or else will be lost. The current state of the riverbank presents an incredibly unique and world-defining, once in a lifetime opportunity to record and substantially add to the historical record.

Contrary to desk-based suggestions made in this planning application, real-life data provided by finds from Mudlarks provides justification for further study of the riverbank before it is reinforced by methods suitable and agreeable to all stakeholders concerned including licensed Mudlarkers. Quick fixes are not appropriate given the significant nature of the archaeological remains currently locked within the area.

I object to the current state of the planning application due to the lack of current and real-life data which invalidates any suggestions and proposals made by the applicants. A more detailed consultation must be made before proper consideration is given to this application.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr John Sinden
Address: 37 St Marys Rd Hayling Island

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I firmly object to this proposal.
This is a very important archaeological site, as evidenced by many recent significant finds, including a unique Roman artefact.
But, if the area is to be covered and lost forever, as a minimum, a full archaeological investigation and survey should be performed beforehand.

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Miss Lucy Sladdin
Address: 7 Queenswood Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Area of archaeological interest and historical site.

River Residents Group

Sent by email October 24th, 2024
Alex Thwaites, City of London Planning

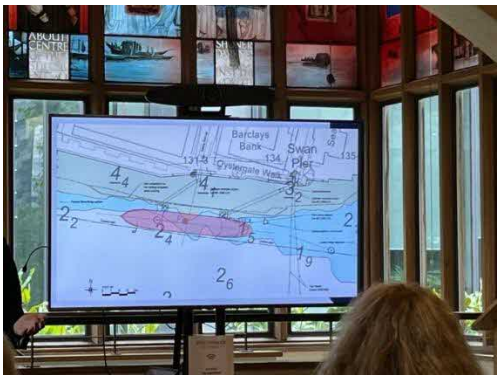
Dear Sirs
OBJECTION TO 24/00938/FULLR3

The River Residents Group (RRG), a community of Londoners living along the Thames in six riparian boroughs, objects to this application as it stands.

We feel that the value of the archaeology on the site has been significantly understated by the applicants. We strongly support all the conditions proposed by Historic England (HE) in their submission of 15.10.24. The RRG also notes that as of today nearly 60 individual objections have been submitted, many by those who know that area of the foreshore extremely well. We support their reservations and concerns.

As these works were evidently *not* triggered by either the Environment Agency or the Port of London Authority, we would like to understand better why they are required at this point and what benefit will ensue from the expenditure involved, especially in view of the risk to archaeology and biodiversity. We would like clarification as to why the works focus only on this small stretch of the foreshore, when damage is also visible close to Cannon St Bridge, for example. The last attempt to revive Swan Lane Pier (2019/20) included repair of this same stretch of campshed alongside work to build a land access, canting brow and a pier for the *Oceandiva*. All those works were at the expense of the commercial applicants and not the City of London as in this case, as indicated by the site plan.

We are aware of the plans of the Honourable Company of Master Mariners (HCMM) to moor an 83-metre barge on the edge of the same stretch of campshed that is under consideration in this application: the HCMM plans were presented to a public meeting organised by the RRG at Southwark Cathedral on 15.7.24, as below.



We wish the Honourable Company well in their plans for a floating Livery Hall and look forward to further consultation with them. But the question arises as to whether the works proposed in this application in fact constitute an effective fragmentation of a larger project that would rightfully require a full consultation of all impacted neighbours including 185 Southwark residents living just 160 metres away – across a river that effectively prolongs and extends noise transmission? What are full implications of these works? Until these questions are answered, we feel that the application is premature.

We also fear that rushing through this application under delegated powers or without further consideration of the bigger picture might put the archaeology and also biodiversity at unnecessary risk.

We note that the Environment Agency (EA) has expressed disappointment in the methodology proposed, on the grounds that it is inimical to biodiversity and habitat gain (also required by the London Plan). In their representation of 17.10.24, the EA states, '*We strongly encourage more ecologically beneficial solutions are explored. The collapse of the existing campshed has created conditions which benefit t intertidal foreshore, including nearby intertidal mudflat, habitat which is listed as a Biodiversity Action Plan (BAP) priority habitat. This habitat is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006*.'

We also note that when similar works were proposed for the same stretch of campshed by the *Oceandiva* consortium in 2019, the EA was in favour of wave booms to minimise erosion. We would like to see this option explored too, and not under the time pressure of a delegated decision.

Meanwhile, we remain concerned about the high level of toxic compounds ('Priority Hazard Substances') including Tributyltin and mercury compounds in the sediment as indicated in the Water Framework Directive Assessment. The applicant makes a point of stating that the works are not specifically to create a mooring for a vessel. However if, once the campshed was repaired, a large vessel *were* to be moored adjacent to it, not only would a berthing pocket require extensive further dredging but also the vessel itself it could create a continuous scour with the Thames' powerful six metre tides, increasing the risk of the diffusion of these compounds.

CONCLUSION

The RRG is in favour of a wholesome, well-considered redevelopment of Swan Lane Pier and all necessary flood defence and restoration works. The restoration of the pier is also, of course, policy compliant. This scheme, if approved, needs to effected via methods that not just preserve but also enhance both the archaeology and ecology of the historic foreshore. Is this application a step along the way to a more impactful development? We would like to see more robust methodology proposed to take into account any potential damage from any works that would be facilitated – further down the line – by this project. As the application currently stands – without a clear explanation of the reasons for and the full implications of the works, without wider consultation and before the exploration of

alternative more eco-friendly and less intrusive construction methods – the RRG supports the concerns raised by HE & EA and therefore objects.

UPDATES

Should any of the matters above be clarified before an eventual Decision or Committee date, the RRG reserves the right to replace this letter with an updated version.

Kind regards,

Michelle Lovric, Vice-Chair
River Residents Group.

https://riverresidentsgroup.co.uk

[redacted]

Comments for Planning Application 24/00938/FULLR3

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Case Officer: Alex Thwaites

Customer Details

Name: Mr Tim Miller
Address: 17, Matlock St Matlock St LONDON

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:FAO Alex Thwaites -
As Chair of the Society of Thames Mudlarks & Antiquarians, I'm writing to object to the proposed planning application on behalf of our 50 members.
We are among the most experienced mudlarks searching the foreshore and have been afforded special privileges by the PLA because of our contribution to the historical record. I have been mudlarking in the Swan Lane area since the early 1980s shortly after the Society was founded and I can confirm that it's one of the riches stretches of foreshore in terms of the artefacts uncovered. Among my personal finds from Swan Lane, is a mint condition gold Roman aureus which has grabbed the attention of the British Museum. There have been an abundance of exciting discoveries made here. It would be an act of historical vandalism if it were to be lost and under the current plans I believe this will be the case. Thank you.