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Mr Jamie MacArthur 20.02.2019

Ms Diana Emtree 19.02.2019

Letter Historic Royal Palaces dated 17 December 2018

Letter Historic England dated 6 December 2018

Letter Greater London Authority dated 14 January 2019

Letter - London Borough of Tower Hamlets dated 8 February 2019

Letter London City Airport dated 28 November 2018

Email London City Airport dated 13 March 2019

Letter Heathrow Airport dated 3 December 2018

Email Port of London Authority dated 4 December 2018

Letter Southwark Council

Letter Natural England dated 1 December 2018

Letter London Borough of Hackney

BRE – Independent Review of the Daylight and Sunlight Assessment (on behalf of the City of London) dated 22 January 2019

Email – Paul Littlefair, BRE - Independent Review of the Daylight and Sunlight Assessment – Solar Convergence (on behalf of the City of London) dated 15 March 2019

Arup Independent Review of the Pedestrian Movement Assessment (on behalf of the City of London) dated 28 February 2019

Cicero door-to-door exercise March 2019

Email GLA officer update 21 March 2019

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Philip Ridley

Address: [REDACTED] Galliard Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Traffic or Highways

Comment: A tulip, in financial circles is symbolic of the Dutch Tulip Mania that caused the collapse of European financial markets in 1637.

Approve this monstrosity and what you will get, is images of it plastered over TV worldwide as a symbol of financial excess and the whole world will ridicule London.

A viewing tower should have positive symbology or none at all. The Monument for example has deeply thought out symbology indicating the re-birth of the City after the fire, whereas a tulip is not only symbolic of one of the world's worst and most stupid financial bubbles, but it is in fact a short lived flower that blooms only in the spring.

This will all be solved by the City of London creating a competition for the design. That way, the world's greatest and best architects have a chance to design a tourist viewing platform that will be the tallest building in the City of London for potentially hundreds of years to come.

Regarding transportation, a visitor attraction close to Liverpool Street alongside this being the terminus for Stansted Express and Stansted Coaches reinforce the recommendation of Southwark Council that rather than cancel the Tourist focussed RV1 that serves the Southbank and Tower of London, that it should be extended to Liverpool Street. The City of London should also be mindful of a strategy for managing the inevitable flow of highly polluting and disruptive private tourist buses that this tower will likely encourage to clog the streets of the City. An extend RV1 is a far better approach to managing tourist flows to the area.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr John Safa

Address: [REDACTED] Wimbledon Hill Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Great addition to the London skyline that will break up the boxy towers nearby and compliment the Gherkin.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Felipe Pelaez

Address: [REDACTED] Folgate Street Linnell House, [REDACTED] London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I live in the area and would love for this to get build. It would attract tourism and add to the unique London skyline.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Bob Slater

Address: [REDACTED] Brecknock Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object, as should you, on the following grounds:

- The proposal would dominate and overwhelm the Tower of London World Heritage Site.
- The proposal would clearly cause chaos at street level, to the detriment of all local road users.
- It makes little more than a derisory offer to London and Londoners. A symbol of exclusivity which will infiltrate and be a symbolic reminder to some of London's poorest communities to the east, of who is still boss.
- Past the glossy and air-brushed GCI images, it strikes me as an average design which, following actual engineering and the inevitable value-engineering, will actually be quite poor, compounded by its dominance on the London skyline.

Most importantly the proposal is a folly and a ruse. How is this a viable venture? Come on City of London Corporation - can you not see this? It is not real. It is the lovechild of narcissistic self-indulgence - a Billionaire in Safra and a mere millionaire (Foster) - a play thing and ultimate status symbol for the power hungry. It is a desperate final role of the dice.

Once built it is there. There is no escaping it. Remember 'the Stump'? Left empty, it will stand as an everpresent symbol of terminal decline. What will you do then? Private flat? The most luxury Air Bnb in the world? Bit of both? You will be left with no choice. Your good work in reclaiming height for the average Londoner, those free galleries in 22 Bishopsgate, 1 Undershaft etc, will be in vain and undermined.

To top it all off the moniker is genius. Fair play to them - indeed they are brash. The Dutch Tulip Bubble of the 17th Century was the original market bubble to be followed by an almighty crash. I can't help but feel that history is repeating itself.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr A Quinn

Address: ■ The Dell london

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This is a superb development making clever use of an unused plot and will surely add to the City of Londons cultural offering.

The design is a fantastic compliment to the Gherkin with similar design echos and although there appears to be a concerted effort to say the desing is not in keeping with the City. Much the same was said about the original gherkin which is now a global icon for London.

The current City's policy in the eastern for huge, blocky towers is a bit of a mess with all of them merging into one large lump, the skyline needs this slender design to break up this mass and give it a defining crown.

The complaints that this slender building is overwhelming and too near to the Tower of London is nonsense. Apart from the fact that this excuse seems to be trotted out by the heritage lobby every time a new tower is proposed in the City shows how weak the argument is. You only have to spend 5 minutes on Tower bridge to observe the masses of tourists taking pictures of the juxtaposition of the Tower of London with the emerging 21st Century city behind. It would also allow

a great many a wonderful view of the tower of London from above.

The design is slender and jewel like and it less than 30 seconds walk from proposed and already built towers ranging from 180-300m . All these office towers, seen in exactly the same views that is supposedly ruined by this design, are much larger and wider than this so it is crazy to suggest this development will ruin the setting of the Tower of London when it is nestled between much larger officer towers. As a sister development to the original Gherkin it is mere feet away & in the same views.

The City culturally is still a bit of a desert, particularly at weekends with a growing number of tourists wandering and snapping pictures of the new towers. This will not only draw more in but give them something new to do with its innovative viewing opportunity & would be a huge asset and boost to the City utilising a wasted space.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Fitzgerald

Address: Manor Way Ruislip Middlesex

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: A great addition to the City of London's Cultural and Tourist attractions. Has the added benefit of helping to visually "thin out" the bulk of the Eastern Cluster of towers. Fully support!

Comments for Planning Application 18/01213/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Nick Llewelin

Address: ■■■, LITTLE BRITAIN LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support this proposal and it should be delivered asap. A great innovative design by Fosters again which complements the Gherkin. Well done! We should be thankful for the investment by the developers creating something special out of this unused plot and trying to make the most out of the point less height limit and viewing corridors..

The views look awesome and will benefit locals not just tourists! London needs a mix of more tall buildings with restaurants and viewing galleries.

The City of London would benefit from this. London would benefit from it. It will add cultural & economic benefits. It is in keeping with the rest of area and adds to the juxtaposition in architecture of this great city.

The Education facility is a brilliant idea for local school kids in the area.

Can you push CAA/government to increase the height limit and go higher so there are no obscured views? There is no reason why not as the current limit is purely arbitrary (the line had to

be drawn somewhere) there are no safety issues. This needs political will to achieve.

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Marie Marie

Address: [REDACTED] Canonbury Road [REDACTED] Canonbury Road London

Comment Details

Commenter Type: Alderman

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Hello

I am reaching out to find out whether you need any business leads for your niche?

We have American business contact details from over 5,000 niches.

To find your business niche, simply go to <https://wowitloveithaveit.com> and search for your keywords.

All of our business leads come in an Excel spreadsheet and have the following information:

Company name

Address

Telephone number

Website

E-Mail

Upon purchase, your B2B list will be delivered to your inbox automatically. You will also receive free future updates directly to your inbox for free.

Our B2B leads are ideally for growing your newsletter list, e-mail campaigns, telesales, social media marketing and much more.

Our business lists have been trusted by over 2,300 businesses and our reviews have an average rating of 4.7 / 5 stars which is a testament to our commitment to delivering results in the B2B marketing field. You will find that our leads are 80% cheaper than the leads provided by other companies.

All of our B2B lists are currently on sale which will be ending in one week.

Do not miss this opportunity to bolster your B2B marketing.

Kind regards

Marie

Comments for Planning Application 18/01213/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Rob Hutchings

Address: Upper St London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Is this a joke proposal?

Arguably the best modern building in London (The Gherkin) is going to be completely lost under this weird looking thing.

I'm really suprised to see Norman Foster's name on this! It really does look like an April fools proposal.

With public galleires in the walkie-talkie and 22 bishopsgate - whats the point in this?

Comments for Planning Application 18/01213/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Oliver Goldstein

Address: ■ Well Road Hampstead London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Both myself and all of my friends strongly believe this would be a brilliant addition to the London skyline.

A beautiful skyline attracts people from across the world and will increase the standing of London as an international city purely through its aesthetic appeal.

The City of London needs to deregulate and encourage innovative design in order to compete with the likes of other developing nations.

Comments for Planning Application 18/01213/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Banks

Address: ■ Montagu Gardens Wallington

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Dear Madam,

As a life-long resident of Greater London, and someone who has a long family history relating to the city of London, I write to object to the construction of the so-called 'tulip tower', at the land adjacent to Bury Street.

The plans, as I have seen them, add nothing positive to contribute to the unique and world class architectural portfolio of the city of London - but in fact add to its degradation as a centre of world heritage.

More specifically, I recognise that the city of London already has a number of distinctive modern skyscrapers, and indeed that there is a need for such high-density office space. At present, these buildings at least have some semblance of existing for commercial purposes, and are therefore in-keeping with the city of London's world renown as a global financial centre. However, this current proposal has nothing other than the appearance of an ephemeral gimmick, and would at once

become an embarrassing blot on the horizon that only serves to cheapen London's world-class reputation. Already, as I am sure you are aware, many commentators have likened the appearance of the 'tulip' to something far less graceful. Furthermore, the eccentric design, particularly standing adjacent to the current 'Gherkin' building, risks London's architecture drifting into nothing more than one further nondescript capital city, on a par with Shanghai and its 'Oriental Pearl Tower'.

I do not believe this design is worthy to stand alongside and cast a shadow (literally and metaphorically) over our architectural treasures of the Tower of London, St Paul's Cathedral, Tower Bridge and The Guildhall, to name but a few.

Respectfully, I ask you to reject this proposal.

Yours sincerely,

Mark Banks

From: [Watson, Rianne](#)
To: [Adjei, William](#)
Subject: FW: Comments for Planning Application 18/01213/FULEIA
Date: 22 March 2019 10:57:58

From: PlnComments@cityoflondon.gov.uk <PlnComments@cityoflondon.gov.uk>
Sent: 20 November 2018 21:56
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments for Planning Application 18/01213/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:47 PM on 20 Nov 2018 from Mr Manuel Kaiser.

Application Summary

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Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Manuel Kaiser
Email: [REDACTED]
Address: [REDACTED] East Parkside London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Other

Comments: Dear Sir or Madam,

I would like to file my objection to this building. While I find the design objectionable I acknowledge that this lies in the eye of the beholder. The main reason I object is because the project stands for many things that are undesirable and in my view incompatible with the needs of Londoners and aims the City of London should prioritise. In short the proposal

- reeks of desperation in its straining after ostentatious effect
- is unsympathetic to its surroundings
- leads to the disneyfication of the area, leading to tourist crowds and undesirable side effects (rubbish, sellers of assorted tat to unsuspecting tourists)
- is wasteful and out of step with the public's desire for sustainable buildings (thousands of tons of steel and concrete wasted on the 'shaft' of the building to achieve minimal usable floor area at the top)
- offers nothing new (London has more than enough restaurants, bars, and viewing platforms both on the ground and high up - Tower 42, London Eye, the Shard, the Orbit).
- wastes the finite space (on the ground and vertically) that is available for development of high rise buildings in London and the City in particular in exchange for minimal floor space.
- if approved, sets a bad precedent by creating the impression that planning permission for any type of development can be 'bought' by inclusion of an education space (or a public park as seen elsewhere).

We all want bars, restaurants, education spaces and architectural statement buildings but all of these can be done in a much better way than what is proposed here. Ideally they should also include residential, commercial and community space, all of which are sadly lacking here.

I would also like to remind you of the universal praise the Bloomberg building has received and anyone who understands why will have to agree that none of its qualities are represented in the Tulip proposal.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Nicholas Fryett

Address: Drummond Penshurst

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:What an absolutely phenomenal and sensational concept and design. Are we really going to let our European neighbours steal away the crown from the City of London, because of a loud minority? This is exactly what is missing, and fantastic to see it proposed. Trust this will be a very easy pass by the planning committee to electrify the skyline and bring more business in.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Richard Rowlands

Address: █ Gawber Street London London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I support the building as I think it would be a beautiful and striking addition to London that would make its skyline even more unique and recognisable. I would like the architects and planners to consider making it taller as if the structure is principally to be used as a viewing platform then it should be clearly taller than the other buildings around it. I think people will not understand why this isn't the case? I have read that the aviation authorities require a limit on the height, but I suggest that it should be challenged as other cities have airport approaches near tall buildings, so why can't London?

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: M Joseph Mc Hale

Address: Brent view road, London, Hendon NW9 7EJ

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am so terribly appalled by this insult to architecture that I believe that it is my duty to voice my concern.

What is quite magical about modern London is the the marriage of new and old, and "the tulip" would disturb this delicate balance, and destroy the quite harmonious skyline of the city of London.

Furthermore it is quite comical that such a respected architecture firm would propose a building that quite frankly resembles a phallus, I truly believed that this was a publicity stunt ment to outrage, but after reading some peoples support of this building, I am truly worried.

I understand that taste is subjective but this building is a case of, you love it, or you loath it, and though highly controversial buildings can sometimes be the most respected pieces of architecture, this is just too much of a risk, it is just too obvious in the skyline, not only is it a risk to the beauty of the London skyline but also the reputation of the whole of London, and England, so many tourists would laugh at the vulgarity of the design.

And to be quite honest, this does not have enough grace to be an iconic piece of architecture.

For all the reasons above, I therefore must make my strong objection known, and I urge any authority capable of refusing, planning permission, to either demand a total redesign of this building, or to refuse, to grant planing permission for this disgrace to architecture.

From: [Watson, Rianne](#)
To: [Adjei, William](#)
Subject: FW: Comments for Planning Application 18/01213/FULEIA
Date: 22 March 2019 10:59:12

From: PlnComments@cityoflondon.gov.uk <PlnComments@cityoflondon.gov.uk>
Sent: 29 November 2018 08:39
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments for Planning Application 18/01213/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:30 AM on 29 Nov 2018 from Mr Doug Ayling.

Application Summary

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Doug Ayling
Email: [REDACTED]
Address: [REDACTED] Petticoat Tower, Petticoat Square, London E1 7EF

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comments: Remarkable. The Safra family wants to draw a giant penis on the historic skyline of London. Can we rightly consider this an act of vandalism?

In the age of #metoo, this braggadocio seems in poor taste. Currently the building exterior is planned to be white. And it's easy to see how this large white erection has reassured those in power.

We live in the neighbouring Petticoat Tower. The City of London should be made aware that if this venture is approved, we will be listing our property (that we own) on Airbnb, in direct contravention of the onerous terms of our lease. The Corporation of London is breaking their covenant with residents. Clearly they regard our city as a tourist trap on the payroll of oligarchs. Not as a home. Not a community. And not the carefully curated work of generations.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
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Case Officer: Bhakti Depala

Customer Details

Name: Miss Mari Shahin

Address: ■ Thurston Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:Wow, such an innovative idea, can't wait to visit once it's done!!

From: [Watson, Rianne](#)
To: [Adjei, William](#)
Subject: FW: Comments for Planning Application 18/01213/FULEIA
Date: 22 March 2019 10:59:52

From: PlnComments@cityoflondon.gov.uk <PlnComments@cityoflondon.gov.uk>
Sent: 24 November 2018 14:47
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments for Planning Application 18/01213/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:38 PM on 24 Nov 2018 from Miss Astrid Kirchner.

Application Summary

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Miss Astrid Kirchner
Email: [REDACTED]
Address: [REDACTED] Petticoat Tower London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Other
- Traffic or Highways

Comments: To whom it may concern,

I personally don't see the point in this building at all and object to the proposed plans for 'The Tulip' for the following reasons:

- No need for elevation: The 12th story building can be erected on the existing site at 'ground level' in replacement of the current 8 story building.
- Height: There are enough tall skyscrapers in the city of London already, so there is no need to artificially create an elevated 12th story building towering over the existing buildings at a height of 350 meters. As it stands the Gherkin, which was once an exciting landmark is now already in the shadow of other (in my view less attractive) buildings. It feels to me like 'The Tulip' would fit better into Dubai than London.
- Views: I am unsure it adds anything aesthetically to the skyline. There are a myriad of viewing platforms in the city already (Shard, Tower 42, Skygarden, etc)
- Sustainability: From an environmentally sustainable and health and safety perspective I am sure there are better solutions available at 'ground level'.
- Noise: The increased traffic and construction noise. The city is grid-locked construction site as it is.

Many thanks for taking my comments into consideration
Astrid

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Diane Howard

Address: [REDACTED] Richmond Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I STRONGLY OBJECT on the grounds of PUBLIC DECENCY.

This proposed recreational structure takes the form of an [REDACTED]. Whereas past towers have always had a certain phallic quality, this erection crosses a clear societal boundary of unconsensual public exposure. This proposal would constitute a crime under the Sexual Offences Act 2003.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ray Tang

Address: █ Harcourt Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Well done Fosters. This must be the ultimate example of British Sense of Humour. I would support any Architectural joke which resemble a 'Carry On' film, a perfect emblem for the City of London and a mascot for the greedy Bankers. I guess the true intention is for these pigs to look out their ivory towers at this massive c0kk up, what better way to show the world here's is the City of D1ckHeads. May be next they can insert a massive big hole next door and call it 'The Urethra'? Let's make the City the cesspool of vanities, who needs Planning!

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Adam Caddy

Address: ■ Sequoia London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Fantastic proposal - and great to see the square mile being more diverse. It's a shame the proposal cant quite break through the height ceiling - can it not be extended a little further to allow the tulip to rise further above the sky line and provide a true vista of London?

Fosters are a great architectural firm and this will be a great extra addition to London.

From: [Watson, Rianne](#)
To: [Adjei, William](#)
Subject: FW: Planning Ref 18/01213/FULEIA
Date: 22 March 2019 11:00:21

From: Cronain O'Kelly <[REDACTED]>
Sent: 19 January 2019 13:21
To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>
Subject: Planning Ref 18/01213/FULEIA

Name	Cronain O'Kelly
Email	
Address	[REDACTED] Market Yard Mews London England SE1 3TJ United Kingdom
Phone	[REDACTED]
Your comments to the planning officer	This is a poor and unattractive design which add to th visual clutter of the London skyline whilst obscuring what is good and beautiful. The educational facilities are a poor substitute for what the Museum of London provides.

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Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Scott Lebon

Address: ■ Dobson Close London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I support this impressive proposal by Norman Foster. It will contribute to making the City of London an attractive place to work and visit.

With Brexit looming, it is very important that the City keeps building and developing. It is great that private investors are willing to invest in such an attraction at no cost to the taxpayer.

The Shard attracts millions of visitors a year, and there is no reason why a similar attraction north of the river shouldn't be similarly successful. When the Gherkin opened to the public on Open House day in 2003, people were queuing up to 7 hours to get in! This shows that there is a huge demand and even affection for new, modern landmarks in this part of London.

The arrival of Crossrail will give Canary Wharf a big boost. If the City wants to retain its preeminent position, it needs to continue innovating. Simply resting on its laurels and hoping for the best is not an option. Reducing the City's dependence on the financial sector is also a good thing. This building will give a boost to the surrounding retailers, bars and restaurants. It will help turn the City into a 7-day a week destination.

Heritage groups have consistently undermined the City's development. We should remember how Historic England (English Heritage) fought tooth and nail against a shorter version of Heron Tower. All they did was waste time and money. They lost the right to be listened to on such matters.

Historic Royal Palaces have been equally obstructive in trying to stop development in the City. Their objections are NIMBYism in its purest form. Their arguments seem to revolve around the fact the views in the City should be frozen in their current form, which of course is a nonsense. These people always complain no matter what, and should be ignored.

This building will fit in nicely with the other approved buildings in the tall buildings cluster. It will be a popular attraction and contribute to the City's success.

**555 PARK WEST
EDGWARE ROAD
LONDON W2 2RA**

Tel: [REDACTED]

e-mail: [REDACTED]



Ms Annie Hampson
Chief Planning Officer
City of London Corporation
Guildhall
London EC2P 2EJ

29th November 2018

Dear Ms Hampson

“Tulip Tower”

I understand from yesterday’s report in The Guardian about the concern of City Airport that consultations on this application are continuing. I would like my objection to the scheme to be added to others.

Apparently the proposed height of the building is 305 metres. I thought that until now the Corporation had a firm policy to limit building height to 300 metres. If I am correct, any breach of the rule, even by 5 metres, will have serious, possibly catastrophic consequences for future planning applications.

The Square Mile was traditionally a city of moderate height buildings up to about 8 floors with the skyline broken by the dome of St Paul’s Cathedral and by many church spires. This has been changed in recent years, so that now we have a hodgepodge of high-rise structures dotted here and there bearing no relation to each other, apart from most of them being of poor external architectural quality. Add the appalling Shard looming over the City from Southwark and the historic City of London has been visually ruined.

It is high time to say enough is enough and to reject this application. In my part of London we fought down the “Paddington Pole” because of its proximity to grade 1 Paddington Station and the effect on views from Hyde Park and Kensington Gardens. Surely the City can be equally caring of its environment.

Yours sincerely,

[REDACTED]
Kenneth Stern

Past Chairman of the Friends of the Royal Parks and of Bread Street Ward Club

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ivan Arenas

Address: ■ Harold road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This would be a perfect opportunity to increase the number of unique attractions in this city, and keep London at the forefront of tourism and capital cities in the world.

I think it looks rather genuine and would rapidly become another recognisable London sight.

Furthermore I think this project is so special and different that would attract a new kind of tourist into the city.

From: Catherine Clark
To: [PLN - Comments](#)
Subject: the "tulip"
Date: 17 December 2018 18:31:46

Dear Sir or Madam,

As a citizen of London I would like to register my utter disgust at the designs for the "Tulip" skyscraper which is currently under consideration for planning in the city.

London has many beautiful and modern skyscrapers which have been carefully designed and positioned.

This latest addition would make us the laughing stock of the world. It is tasteless in the extreme.

A sloppy piece of design which should not have even reached this stage.

Surely not! Please!

Yours sincerely Catherine Clark



From: PlnComments@cityoflondon.gov.uk
To: [PLN - Comments](#)
Subject: Comments for Planning Application 18/01213/FULEIA
Date: 26 November 2018 21:47:18

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:38 PM on 26 Nov 2018 from Mrs Anastasia Shteyn.

Application Summary

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Anastasia Shteyn

Email: [REDACTED]

Address: [REDACTED]

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Other

Comments: I don't understand why we need this phallic-shaped attraction, with little aesthetic merit. As a resident of Petticoat Tower, I object to this construction project. It will create noise, and turn the neighbourhood into a construction site for years to come, affecting property prices and residents' daily comfort. I would also like to second Mr. Manuel Kaiser's comments, as he hit the nail on the head.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr R Waldegrave

Address: McGregor Road, London W11 1DE

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am objecting to the proposed building on purely aesthetic grounds. It is a repulsive design which has no place in London's skyline.

No doubt the architects, Foster & Partners, believe that they have come up with a building that will be "iconic" but the problem is that every other building in London's new cluster of tall buildings ("the gherkin", "the cheese grater", "the walkie-talkie" etc.) is also trying to be "iconic". The result is a complete mess - not every building can be an icon.

Furthermore this building gives no "sense of place" - it is yet another piece of glass and steel hubris that could be in any of the major modern cities of the world from Dubai to Shenzhen. Surely planners cannot believe this building will be a unique attraction for London, when its main effect is to make London's skyline even more generic - just another modern city where the likes of Foster, Rogers, Piano etc. have been given free rein to express whatever wacky idea has popped into their head? Unlike Dubai and Shenzhen, London has a 2000 year history, and the City of London in particular has a unique built environment. THAT is why tourists come to London - not to see the

freakshow of ill-conceived buildings from the last 20 years.

If the property developers wanted to do something truly radical, how about a low-rise stone construction built according to traditional principles of architecture? You could have just as much floor space (due to the incredibly inefficient design of the "tulip") and, who knows, it might actually look nice and bring some pleasure to the people who are forced to look at it every day.

I also note that the property development company is registered in Luxembourg. If we are going to grant these extraordinary licenses, it could at least be to companies willing to pay tax in Britain.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Simon Hancock

Address: Belvedere Buildings Walworth London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building looks horrible. It is a monument to arrogance. Stop destroying London! Spend the money on restoring some of the beautiful historic buildings instead. There's no point having a viewing tower if there's nothing nice left to view!

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Miss Rachel Harris

Address: ■ Nodders Way Biddenham Bedford

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please consider this a strong objection to the plans by Foster's and Partners 'tulip tower' proposal.

We have been told by key scientists that we have 12 years to drastically change our ways of life - in order to sustain life for future generations and prevent catastrophic climate change. I do not believe that approving this planning proposal is in keeping with setting a precedent that protects and restores the environment. I believe that this tower obliterates any regard for the environment by creating massive amounts of emissions and using vital resources just for the sake of it and for the benefit of one rich man.

Please consider long term environmental conservation ahead of any short term economic gains that this tulip might bring! And please, as a London lover, do not aesthetically turn your city into Dubai! In an age where technology and engineering are expanding building capabilities beyond the imaginable, the questions are no longer 'can we do this' but 'should we?'. THE ANSWER IS NO!

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

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This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Roberts

Address: ■ sycamore drive Lache Chester

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Amazing development, can't wait to visit. About time London had a really tall purpose built viewing tower like this. Great attraction.

From: [Watson, Rianne](#)
To: [Adjei, William](#)
Subject: FW: Comments for Planning Application 18/01213/FULEIA
Date: 22 March 2019 11:00:48

From: PlnComments@cityoflondon.gov.uk <PlnComments@cityoflondon.gov.uk>
Sent: 20 November 2018 00:09
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments for Planning Application 18/01213/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:00 AM on 20 Nov 2018 from Ms Marianne Harris.

Application Summary


Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant / bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1 / A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].
This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow , DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Marianne Harris
Email:
Address:  Ladbroke Walk London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Other
- Traffic or Highways

Comments: unbelievable. is there a competition for the ugliest skyscraper in Nwe?
and if we seriously thought the City is suffering from a lack of visitor attractions, why don't we improve the transport infrastructure first.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Tim Widden

Address: ■ Kelday Heights ■ Spencer Way Shadwell

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Great addition to the City. London currently seems to waste the square mile with regards to it being a destination for the public. This will help bring energy to the area on the weekends and invite visitors to see our unique mix of ancient and modern architecture on medieval streets. The slim design also breaks up the 'clump' effect that the close proximity of the current and upcoming skyscrapers are creating. Great to have a project in the pipeline that is designed for the public to experience and enjoy the City.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

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This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Ray Moore

Address: ■■■ Coppins Road Clacton-on-Sea

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This tower will make a great addition to an already iconic global city like London.

This will enhance the skyline by breaking up the wall of blocky towers nearby, and will give London yet another iconic structure that would stand up against similar viewing platforms giving London its own version of CN Tower, Space Needle or Stratosphere in Vegas.

My only complaint against this proposal is that it is far too short. It should be at least 320-metres or more to really stand out on the cityscape.

Otherwise, i as a regular visitor to London and a proud Britain wholeheartedly support this proposal to bring some futurism to an ever expanding metropolis.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Steve Crew

Address: [REDACTED] Vicarage Road Rochester

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I assume the usual killjoys will be against this?

This is stunning, the more the better. Close City Airport and double the height!

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

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This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Miss Rebecca Alexander

Address: ■ The Pyke Rothley Leicester

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This scheme is aimed entirely at attracting tourists and has no benefit to real people who live in the area. It's height is entirely determined by an egotistical desire to have the largest structure in the City of London given the diminishing prominence of the Gherkin building on the neighbouring site. It would make zero architectural or townscape contribution to the surrounding area, particularly the tower which is blank for the majority of its 305 metres.


From: Peter Rose
To: [PLN - Comments](#)
Cc: [Jude Goffe](#)
Subject: 18/01213/FULEIA Land adjacent to 20 Bury Street London EC3A 5AX
Date: 13 March 2019 16:29:32

I object to this proposed development

It would lead to further pedestrian flows in an area which is already suffering from overdensification of development.

The City already has difficulty in controlling anti-social activities and litter collection in this area particularly related to the nighttime economy.

Kind regards

Peter Rose tel 



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

12th February 2019

F.A.O. Bhakti Depala

Dear Ms Depala,

Re: 18/01213/FullEIA
Land Adjacent to 20 Bury Street EC3A 5AX

I have been retained by the Diocese of London to respond on their behalf to the above application and express their concerns regarding the nature of the planning permission being sought and the potential adverse impact it will have on Development Control in the City if approved.

The Diocese takes the view that the intrusion the application would make on the skyline is not warranted by the use for which it is intended. The application appears to place undue emphasis on its contribution as an educational facility and further seeks to exploit policies for the diversification of The City's economy and for supporting tourism. In our thinking these policies are Citywide in their intended application but being applied here to an area that has been "carved out" of other restrictive provisions specifically to provide for high density, high rise, commercial development. Allowing other uses to "compete" for space in this location is illogical.

The design is of undoubted technical dexterity as it seeks to exploit airspace over an adjacent building in the same ownership but in doing so seeks, it seems, to enhance only its financial value without improving its efficiency as an office.

The scheme will also, temporarily no doubt, achieve the status of the highest structure in the Square Mile, cleverly realised from the smallest of footprints. In doing so however, it simply adds to the wall of glass that the City's "cluster of tall buildings" has become, removing the "punctuation" necessary for the onlooker to read the architecture of carefully designed individual buildings.

The design offers no recompense for this by having a commanding street level presence worthy of an individual's attention and so is of doubtful overall contribution to the built environment either in the immediate vicinity of the site or from further afield.

The overall impact will be to simply add volume to the competition for the nationally protected views of the truly iconic St Paul's Cathedral as well as local views of other historic monuments and world heritage sites. The scale of the contrast between the historic and modern profiles on The City's skyline is becoming unbalanced and should not now be compromised further as has been the case with recent high rise schemes in Newham.

EDWARD MOODY CONSULTING

MOBILE

EMAIL

WEB

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

It is accepted that the application carefully avoids overtly challenging the precise wording of individual Planning Policies but the Diocese takes the view that it indirectly challenges the spirit and overall intention of many. In short the application is exploiting flexibility designed to provide for the nationally important financial industry without providing the jobs, revenue and positive contribution delivered by much less controversial applications. In this way the scheme creates ambiguities and will unhelpfully make future Development Control in The City a more prescriptive and constraining process, something The Corporation has skilfully avoided in the past and in doing so allowed both the property and financial industries to flourish in The City.

On balance the Diocese does not see the merit of approving this scheme but if the Planning Committee does not resolve to refuse permission there are a number of practical issues that need to be addressed before permission is granted. These include but are not limited to the following:

- a) The scheme does not contribute well enough to the street scene and local environment to justify the loss and overshadowing of the residual open space and re provided quasi-open space. Some may take the view that the understated landscaping around 30 St Mary Axe is austere in taste however it has provided the space to allow art installations, clear lines of sight and the free flow of pedestrians. It is also consistent with the simple elegance of the original buildings design, which won the Stirling Prize in 2004. Re-providing a garden area on top of the new pavilion building is not of equivalent public benefit and so an alternative provision should be made elsewhere locally to offset this loss.
- b) The consultants state in the planning submission that there is a loss of open space but it has not possible to quantify this as the detail is lost in the volume of other information deposited in support of the application. In the opinion of the Diocese, which is itself a large provider of open space, the replacement of street level amenity with roof top gardens is a very poor substitute and not truly a like for like swap. "Public" access through buildings is subject to discretion by varying security protocols unlike a churchyard, which is open to all. Details of the lost area and access arrangements should be made abundantly clear in the application and to members of the committee when making a decision. The applicants should make alternative provision for the area lost and the inferior public access offset by enhancements to other facilities near by.
- c) Technically innovative designs are vulnerable to unpredictable experiences, as the applicant's architect will recall from the opening of The Millennium Footbridge. Building Regulations for tall structures have been found to be wanting in recent times which begs the question as to what precautions can be taken by the applicant to ensure a venue, which encourages coach loads of children to visit on a daily basis, is sufficiently robust and provides safe alternative routes of evacuation to protect them from misfortune?
- d) The Diocese takes a keen interest in matters related to education. The London Diocesan Board for Schools, which is chaired by the Archdeacon of London, is the largest education provider in the Capital and the only provider of state education in The City of London. The free state visits proposed need to be part of a curriculum aligned educational programme if they are to be of merit and offered in significantly greater numbers if they are to be of substance. With the programme and capacity elements properly modelled through detailed consultation with education providers the claim that there is an educational element to the application takes on substance. If, these are then coupled with irrevocable planning obligations to maintain the facility free of charge to state school users (particularly those along the City fringes and



without priority given to fee paying applications from private schools when bookings are taken), then objections on these grounds may be withdrawn.

- e) The construction period required to deliver this technically complex scheme is inordinately long particularly when considering the meagre volume of occupational space provided. The historic network of streets around the site further compromises the delivery programme. This coupled with relatively narrow pavements will also make their use by heavy construction vehicles a challenge. The Diocese takes the view that this will adversely impact the listed and historic buildings in the area, which are less well equipped to handle the inevitable and protracted noise and vibration generated. The applicants should consult and agree with local occupiers an effective package of mitigation measures that can be reflected in the planning conditions and are legally binding on the applicants before permission is granted.
- f) The local churches provide places of sanctuary and space for quiet contemplation in addition to the traditional opportunities for worship that frame the working day. The permitted hours for noisy working during construction and demolition should protect these occasions, which are enjoyed by residents, workers and visitors alike. Again a binding agreement should be secured limiting the adverse impact during construction should be agreed with local occupiers before the grant of planning permission is contemplated.
- g) Despite the usual mitigation measures to control dust and airborne pollution released through the demolition and construction process there is always a need for additional cleaning, maintenance and rodent control around building sites. In some circumstances the provision of double-glazing has been considered necessary. These additional costs should be met by the development, agreed and installed before work strip out work commences on site.

Contrary to the applicant's assertion that this proposal does not adversely affect St Paul's Cathedral, as other consented schemes will largely conceal its presence from specific vantage points, it does unwittingly contribute to a bulk and massing that is to the detriment of the setting as a whole of a nationally protected and iconic silhouette. There have been other unwitting intrusions that have encroached into the protected viewing corridors and increased vigilance is required to carry on the good work of preserving a landmark synonymous for centuries with the City of London.

I look forward to the response to all of the above and my client who is a long term partner of the Corporation as a force for good in the City would welcome an opportunity to engage with the Applicants in person to better provide for the greater good of all.

Yours sincerely,



E.R.W. Moody.
Proprietor.

From: Nick Llewelin
To: [PLN - Comments](#)
Subject: RE: Application Consultation (18/01213/FULEIA)
Date: 14 February 2019 17:08:33

Thank you.

As a local business, we think this is a great innovative design and fully support the proposal.

The City of London would benefit from this. Cultural & economic benefits are welcomed.

The enlarged Education facility is welcomed.

Best regards

Nick Llewelin | Membership & Operations Manager

Society of Occupational Medicine | 20 Little Britain

| London | EC1A 7DH Tel: [REDACTED]

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-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 14 February 2019 11:07

To: Nick Llewelin <nick.llewelin@som.org.uk>

Subject: Application Consultation (18/01213/FULEIA)

Dear Sir/Madam

Please see attached consultation letter for planning application 18/01213/FULEIA (Land Adjacent To 20 Bury Street London EC3A 5AX).

Kind Regards

Planning Administration
Department of the Built Environment

City of London

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Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ. (RECONSULTATION - An amended plan has been received increasing the proposed area for education floorspace (from 190 sq m to 314 sq m.) -

Supplementary supporting information has been submitted in the form of an Economic Impact Assessment)

Case Officer: Bhakti Depala

Customer Details

Name: Mr Sam Resouly

Address: ■ Lime Street ■ Lime Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: We represent the owner of Holland House and Renown House, Bury Street. These office properties are the place of business for a wide range of enterprises who enjoy the micro location and amenity of the Gherkin Plaza. The proposed development has extremely limited access for the delivery of materials and labour. With the expected 5 year development program, there will be an extended period of disruption, with restricted access and periods of extremely noisy works. In addition to the occupiers of the building, there are many members of the public visiting these premises throughout the day and we have serious concerns for the safety of all. With the very significant number of lorry movements expected along the extremely narrow Bury St, this will create a very hostile and dangerous environment. There appears to have been no consideration given for the welfare of neighbours and the impact of these works on all of the

businesses and residents in the area. We strongly encourage the City of London to refuse permission for this proposed development and we would appreciate an opportunity to comment in greater detail, with a specific focus on site traffic management, noise, vibration and dust expected from these proposed works.



7th March 2019

Bhakti Depala
Development Division
Department of the Built Environment
City of London
Guildhall
PO Box 270
London EC2P 2EJ

Dear Ms Depala

Planning application ref 18/01213/FULEIA – The Tulip

I am submitting these comments on behalf of the London Sephardi Trust and the Spanish & Portuguese Sephardi Community in relation to the impact on the Bevis Marks Synagogue of the 'Tulip' development as proposed in planning application 18/01213/FULEIA.

You will recall that our planning consultants J Watson Consulting Ltd wrote to you on our behalf in December 2018 explaining that we were liaising with the applicants and were awaiting the results of studies into the daylight/sunlight and heritage impacts of the proposed development on the Synagogue. We are still liaising with the applicants but given that I understand the planning application is due to be presented to the City's Planning & Transportation Committee on 2nd April I set out below our position.

I should firstly advise you that we have established a constructive dialogue with the applicants who have been most helpful in clarifying the potential impacts on the Synagogue, including through assistance with our technical studies.

We have received independent advice on Daylight/sunlight (Point2 Surveyors Ltd), Heritage (Caroe Architecture Ltd) and Town Planning (J Watson Consulting Ltd).

Setting of the Synagogue and courtyard

We can see that the Tulip would introduce a dramatic new feature into the western skyline of tall buildings viewed from the Courtyard. It will be particularly dominant in views both from the Courtyard on the north side of the Synagogue building and from within the glass roofed restaurant extension to the south of the Synagogue.

We are advised that the harm to the heritage significance of the Synagogue would not be 'negligible' as suggested by the applicants' advisors but would amount to 'less than substantial'. We are also advised that under the National Planning Policy Framework 2019 (para 193-194) the City Corporation should give great weight to the conservation of this Grade I listed building irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, including from development within its setting.



We must therefore object to the proposed development's harm to the heritage significance of the Synagogue and its setting.

Benefits

We understand 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 (NPPF, para 196).

We acknowledge that there are potential public benefits to the Synagogue which could go some way in counteracting the harm the Tulip would have on its heritage significance.

In particular, the Trust wishes to increase public understanding of the Synagogue's history and is planning to improve visitor facilities along with an expanded educational programme. The Tulip structure would be some 30m-40m from the Synagogue and visitors would look down upon the Synagogue building so there is obviously potential for the Synagogue's history and symbolic importance to be featured in the Tulip's educational facilities. Visitors to the Tulip could also be encouraged to visit the nearby Synagogue.

We are in discussions with the applicants about how these and other benefits to the Synagogue could be secured.

Without such benefits, the Trust would maintain its objection to the scheme on the grounds of harm to the heritage significance of the Synagogue including its setting.

Daylight and sunlight

We understand that the Tulip would have virtually no overshadowing impact on the Synagogue or courtyard and, considered in isolation, would have a very small impact on daylight levels. However, when considered in the context of the cumulative impact of other proposed developments we are advised it would contribute to a noticeable reduction in daylight levels.

The Trust must object to the Tulip's contribution to any reduced daylight levels in the courtyard or Synagogue which are already sensitive to further reductions in levels of light.

Construction

Given the proximity of the site to the Synagogue (30m-40m) we are concerned that appropriate measures should be put in place to ensure no damage or disturbance to the Synagogue during construction. The Synagogue building is 318 years old and has shallow foundations so will be particularly susceptible to construction vibration. We note that the Environmental Statement accompanying the application refers to the uncertainties over predicting construction vibration impacts on nearby buildings and that monitoring will be necessary.

We request that appropriate conditions are attached to any planning permission requiring the most sensitive level of construction vibration monitoring and accompanying measures to ensure that no damage is caused to the Synagogue.



Illumination

Illumination of the structure could have significant night-time impacts on the Courtyard and the Synagogue interior, including during candle-lit services. We request that appropriate conditions are attached to any planning permission requiring approval by the City of illumination proposals and that such approval would be subject to no harmful impacts on the activities in the Synagogue and Courtyard.

We will continue our discussions with the applicants and will let you know if anything further arises of relevance to the consideration of the planning application. For now, I hope you find these representations helpful.

Yours sincerely

[Redacted signature]

David Ereira, Vice President
 S&P Sephardi Community

Bevis Marks Synagogue - Heritage Impact of Proposed Development on land adjacent to 20 Bury Street (known as 'The Tulip') (Planning application 18/01213/FULEIA)

9 January 2019

Introduction and Purpose

Further to advice provided in May 2018 regarding the proposed development at 100 Leadenhall (consented in July 2018) in the vicinity of Bevis Marks Synagogue, this paper aims to provide initial advice to the S&P Sephardi Community in light of proposals for a further new development known as 'The Tulip', on land adjacent to 20 Bury Street. The paper responds to information provided as part of the application for planning consent and responds to additional information from the developers and the S&P Community's other professional advisers.

The S&P Community's main interests from a heritage impact perspective concern:

1. The potential impact on views within and from the Synagogue, Annexe building and Courtyard
2. The potential impact on the setting of Bevis Marks Synagogue and its historic Courtyard.
3. The potential impact on the experience of worship and visiting inside the Synagogue building.
4. The potential impact on the fabric of the Synagogue and the experience of worship and visiting during the construction period.



Figure 1 - Foster + Partners' aerial visualisation of The Tulip next to 30 St Mary Axe

1. The potential impact on views within and from the Synagogue, Annexe building and Courtyard and
2. On the setting of Bevis Marks and its historic Courtyard

In Volume 2 of the *Environmental Statement: Townscape and Visual and Built Heritage Assessment (TVBHA)* by Tavernor Consultancy/Cityscape Digital, it says (on page 54):

As demonstrated by Views A20 and A21, the Proposed Development would be visible from the courtyard to the north of the synagogue. It would appear beyond the top of the Gherkin taller than the existing tower in upward tilted views as a slender addition to the skyline. Due to the alignment of the courtyard with the location of the proposal, it would not be

highly visible in southward views from the courtyard. Although it would change the composition of the upward looking component of the view, it would not change its taller modern character and the proposed tall structure would be seen in relation to an established context of other existing tall buildings which form part of the City's Eastern Cluster....

The significance of the likely effect on heritage significance is described as Negligible.



Figure 2 - Tavernor Consultancy Viewpoints in Bevis Marks Courtyard

In terms of the cumulative effects of consented and proposed developments, the TVBHA says: *The consented 100 Leadenhall Street would be highly visible in southward views from the courtyard and along Heneage Lane appearing in front of 52 Lime Street. Although 100 Leadenhall would be seen from the courtyard of the synagogue with a noticeable effect on upward southerly views, it would be seen in relation to existing tall buildings and in views in other*

directions it would not be visible. It would not materially diminish the heritage significance of the Grade I listed synagogue.



Figure 3 - View 20 (Proposed) in the TVBHA

The TVBHA commentary suggests that The Tulip will be visible ('not highly visible') in the view southward but the viewpoint/angle of the rendered view provided in the TVBHA (A20) does not show the new structure (see Figure 3).

Although of a slimmer profile than The Gherkin (30 St Mary Axe) and of considerably greater height, the proposed development will certainly be prominent in the Courtyard view looking south-west (View A21 in the TVBHA), appearing in front of The Gherkin and obscuring quite a large portion of it. This adverse 'crowding' effect is further heightened in the cumulative view (Figure 6 below) which shows the Tulip in concert with the consented scheme at 100 Leadenhall.



Figure 4 - View A21 (Proposed) in the TVBHA



Figure 5 - Existing view of 30 St Mary Axe from the Courtyard



Figure 6 - View A21 (Cumulative) in the TVBHA

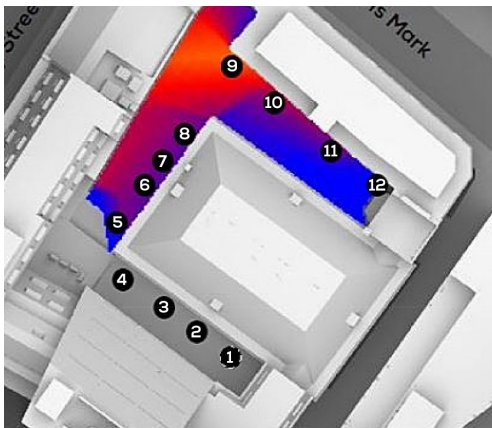


Figure 7 - Additional viewpoints from within the Courtyard and Annexe Building

At the S&P Community's request, the developers have provided additional rendered images of how the proposed development will appear from a range of other viewpoints within the Courtyard directly in front (to the west of), and to the north of the Synagogue building.. These are views numbered 5 to 12 in the document appended to this paper, augmented by additional images which show the full-sky view of the proposed structure from the selected viewing points.

These additional images show that The Tulip will be particularly dominant in views from the Courtyard on the north side of the Synagogue building (views 9-12) with quite a significant adverse aesthetic impact. This not only changes 'the composition of the upward looking

view' as asserted by the Tavenor Consultancy but the very nature of the view by introducing an element that is quite alien (in terms of form, scale and materials) to the surrounding buildings, both old and new.

In these images, the proposed shaft of The Tulip is somewhat reminiscent of a factory chimney looming over the Courtyard and Synagogue building. Unlike a chimney which tends to taper towards the top and where the visual impact might arguably diminish with height, however, the proposed structure grows larger at the top, appearing somewhat like a mushroom, which will have the effect of increasing the visual impact. One other building in the City does this: 20 Fenchurch Street (known as The Walkie-Talkie), with the effect that it is dominant in every view in which it appears. The Tulip is not the same shape as this of course, but the increasing girth it achieves at height will have a similar overbearing effect on the restricted view out from Bevis Marks Synagogue Courtyard.

A significant element of the proposed design is the external moving gondola ride on all four sides of the glazed structure at the top of the building. This constantly moving feature with its track-like mechanism (which will be clearly visible from the Courtyard on three sides of the proposed structure) has the potential to provide a fairly significant adverse visual and aural impact on the experience of visiting Bevis Marks Synagogue, an immensely important religious and historic place. It will particularly affect the views from, and the experience of being within, the historic Courtyard where, upon entry, it is currently still possible to experience a sense of discovery and being transported from the bustling city streets to a place with a strong historic character, and one of sanctuary and spiritual refreshment.

The Tavernor Consultancy also states that the proposed development ‘*would not change [the] taller modern character*’ of the upward looking view. We would argue that the new building would significantly change the taller modern character of View A21 (and views 9-12) in that The Tulip (at a proposed height of 305 metres) will appear an order of some magnitude higher than 30 St Mary Axe (180 metres high), or indeed even 100 Leadenhall as it appears in Cumulative View A21 from the Courtyard. The combined effects of The Tulip and 100 Leadenhall (not to mention other consented schemes at 1 Undershaft and 40 Leadenhall) are likely to significantly change the taller modern character of the surrounding area.

With regard to the statement on p.54 of the TVBHA:



Figure 8 View 12 from the north-east Courtyard outside of the Beadle’s House

‘...The proposal would not harm the ability to appreciate the relationship of the synagogue to the surrounding tight grain of the historic street layout that survives in the courtyard and Heneage Lane and provides a remnant of the synagogue’s contemporary early 18th century setting. The visibility of the Proposed Development would not change the character of the synagogue’s modern setting in the heart of the City of London. Its visibility would not diminish the heritage significance of the Grade I listed synagogue.’

Its visibility would not diminish the heritage significance of the Grade I listed synagogue.’

Due to its height and visual dominance over the surrounding area, and its proximity to the Synagogue and Courtyard, the overall impact of the proposal is likely to further diminish the historic character of the Synagogue and its immediate Courtyard setting. The historic tight grain of this area was based on buildings of a domestic/small commercial scale, height and mass whilst the new development is of a completely different and unprecedented form and height.

As noted above, a highly dominant element of the proposed building experienced from within the Courtyard will be the solid concrete shaft of The Tulip which, unlike the glazed structure of 30 St Mary Axe (in front of which it will sit), will not reflect light but is more likely to have a ‘deadening’ effect, somewhat arresting the play of light around the Courtyard and Synagogue building.



Figure 9 - View of 30 St Mary Axe through the glass roof of the Synagogue Annexe facing west

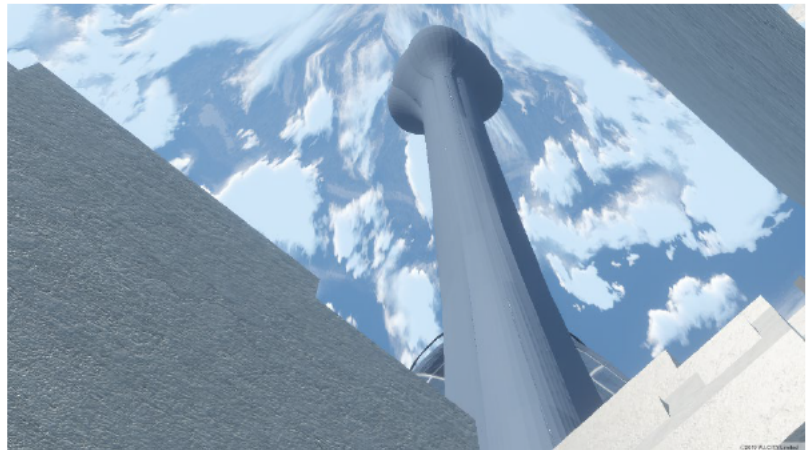


Figure 10 - Rendered View number 4 from within the Annexe Building (Annexe roof structure not shown)

Also of concern is the impact of The Tulip on views through the glass roof of the Synagogue's Annexe Building - 30 St Mary Axe can currently be seen through this glass roof when facing west (see Figure 9 above). The Annexe building is a publicly accessible space which has been used as a restaurant, as well as a space for the community's use and is, for example, where members of the congregation gather for *Kiddush*¹ following Shabbat services. Rendered images of the proposed development as it will appear from within the Annexe Building have been provided by the developer and are numbers 1 to 4 in the document appended to this paper. Again the viewer is reminded of a factory or power station chimney rising way above other surrounding buildings in the view, blocking out a portion of the currently visible sky, and as noted above, the head of The Tulip with its moving features will be a particularly overbearing feature.

3. The potential impact on the experience of worship and visiting inside the Synagogue building.

Work carried out by Point2 Surveyors shows that although the proposed development would have virtually no overshadowing impact on the Synagogue when considered in isolation, the cumulative effects of this and other consented developments will result in a noticeable reduction in daylight levels within the Courtyard. It is also likely that the historic character and experience of being inside the Synagogue building will be affected by reduced light levels during services- both in terms of direct light and that reflected from the façades of the buildings immediately surrounding the Courtyard (as already noted above).

As with most historic places of worship, the large upper windows of the Synagogue were designed to maximise the amount of natural light entering the building. As noted in the guidebook for Bevis Marks 'Good lighting is essential in the synagogue, where reading from the Torah scrolls is central to many services'², and light is a key element in Judaism symbolised by the *Ner Tamid*, the eternal flame or perpetual lamp hanging in front of the Ark.

Many services occur at dusk and dawn and so the overshadowing and blocking of natural light will have a real and measurable effect of prematurely bringing on the dusk or prolonging darkness as the

¹ A valued social time with light refreshments, words from the Torah and songs.

² Kadish, S (2001) *Bevis Marks Synagogue: A short history of the building and an appreciation of its architecture*, Survey of the Jewish Built Heritage in the United Kingdom & Ireland and English Heritage, p.12

day begins. Therefore, this is not simply an issue of visitors being able to appreciate the historic significance of the splendid interior nor those worshipping inside simply to maintain an appreciation of the outside world.



Figure 11 – Image illustrating the proposed lighting strategy for The Tulip with three layers of light including ‘Interior glow’, lighting of the linear elements and ‘Base uplight’

Further to the impact of the gondola ride as set out above, the Design and Access Statement prepared by Foster + Partners sets out the lighting strategy for the new development. Lighting is proposed to come mostly from within the glazed upper elements of the new building (described as ‘interior glow’). The illuminated head of the structure will be clearly visible in views from the Courtyard and we note from the illustration on p.162 of the Design and Access statement (shown above as Figure 11) that there will also be external

façade lighting present on the linear elements of the concrete shaft as well as a layer of ‘Base uplight’, which according to the rendered image appears to extend to some considerable height. The proximity of the new structure to Bevis Marks Synagogue suggests that the effects of the ‘interior glow’, uplighting and linear façade lighting could be quite considerable, also adversely affecting the experience of the Courtyard with its restrained historic lamp lighting and the Synagogue building (which retains its original brass chandeliers and is lit by candlelight for special services and events), when attending for evening worship or other events taking place on site. This will also adversely impact upon evening use of the Annexe Building where the illuminated shaft of the Tulip, and the head of the structure with its moving elements will loom overhead.

4. The potential impact on the fabric of the Synagogue and the experience of worship and visiting during the construction period.

The S&P Community is seeking advice on the potential structural implications of the development. Although we acknowledge that this is not a planning issue as such, the potential for harm to the structure of the Synagogue building due to, for example, the vibrations for groundworks and piling to support such an immense structure are a significant concern and one which will require very careful modelling and management.

There is also likely to be considerable noise and disturbance during the construction period which will affect Shabbat morning services if work takes place on Saturdays (permitted construction times in the City are 0900-1400 on Saturdays³). Weekday daily worship commences before the 0800 permitted start time of construction. Visits to the Synagogue during the day will certainly be impacted.

³ Revised hours effective from 2 January 2019.

Conclusion

Although of less than substantial harm, in summary we do not agree with the Tavernor Consultancy's conclusion that the significance of the likely effect of the proposed development on the heritage significance of Bevis Marks Synagogue is Negligible. It is our view that the proposed development will have a considerable negative impact on the heritage significance of the Synagogue and its historic Courtyard setting due to its proximity, form, scale, visual dominance, materials, lighting, and the elements of the building that will be in perpetual movement.

The historic Synagogue and Courtyard have accommodated and enjoy a happy visual relationship with 30 St Mary Axe which provides an attractive juxtaposition and point of contrast where it appears from within the Synagogue site. 30 St Mary Axe is clearly present in the views but it does not dominate Bevis Marks Synagogue nor adversely affect its historic character. The Tulip will change and in our opinion spoil this relationship, asserting itself in the manner of an enormous chimney-like structure that mushrooms at its crown; and which will effectively supplant 30 Mary Axe in key views, with the additional potential distractions of movement, light and noise.

Public benefit is a concept supported by the NPPF where there is less than substantial harm to the significance of a designated heritage asset.⁴ Although it may be argued that the proposed development may bring more potential visitors to Bevis Marks Synagogue which would be welcomed, the public benefits of the proposal, do not in our view outweigh the harms – there are other consented and constructed tall buildings in the Eastern Cluster with public viewing galleries, 'sky bars' and restaurants. There are also many public benefits currently provided by Bevis Marks Synagogue, the quality of which will undoubtedly be eroded by what is being proposed and this should not be overlooked.

⁴ Paragraph 196, Ministry of Housing, Communities & Local Government (2018), *National Planning Policy Framework*, p.56.

Background Information/Analysis

The Courtyard is not only the immediate setting to the Synagogue but also an intrinsic part of the Bevis Marks complex (comprising Synagogue, Courtyard, Beadle's (Rabbi's) House and twentieth century Annexe) and the operation and functioning of the Synagogue.

Today, the Courtyard is used for the celebration of festivals and Holy Days and is an important area for guests to assemble in before and after weddings at the Synagogue. As an historically and aesthetically significant part of the designed ensemble, the Courtyard could possibly even be argued to not only be the setting of the Synagogue but also a feature of its special architectural and historical interest. The Planning (Listed Buildings and Conservation Area) Act 1990 sets out that:

*In considering whether to grant planning permission for development which affects a listed building or its setting, 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.⁵*

By its nature the Courtyard is an enclosed space contributing to the historic character of the Synagogue building, which is not easily discernible from the street and revealed fully only upon entry to the Courtyard. The Courtyard is a public space with restricted access, however, Historic England's good practice advice document on the setting of heritage assets notes:

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.⁶

Views are acknowledged as a key contributor to the setting of heritage assets:

Views and setting

The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.⁷

Views across and out of the Courtyard, as well as visibility of the sky are important contributors to the setting of the Synagogue, not to mention the Courtyard's amenity value. These will be detrimentally affected by the proposed development.

Bevis Marks is situated in a densely built area which is undergoing considerable development. A number of buildings are already visible in views upwards and outwards from the Courtyard and the cumulative effects of new development are a key consideration in the evaluation of impact on setting. 100 Leadenhall alone will have a significant impact on the setting of Bevis Marks Synagogue. Therefore, the anticipated cumulative effects of the proposals for 100 Leadenhall and The Tulip, when considered in conjunction with consented schemes at 1 Undershaft and 40 Leadenhall are by no means small-scale incremental incursions on Bevis Marks Synagogue. They will significantly affect its setting, the views and atmospheric qualities of the Courtyard, particularly as experienced upon coming through the entrance gates.

⁵ Planning (Listed Buildings and Conservation Area) Act 1990 S.66(1)

⁶ Historic England, The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), p.2

⁷ *Ibid.* p.6

Historic England good practice advice is that if the setting of a heritage asset has been compromised by what has happened previously this does not mean further impact from new development should not be considered harmful, and opportunities should be taken to improve the setting of the heritage asset:

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.⁸

Economic viability of the Synagogue and the impact on the vital commercial aspects of its operation are other important considerations in the case of Bevis Marks. Reduction in the amenity and spatial/atmospheric qualities of the Synagogue, Courtyard and the glazed roofed Annexe building by the new development could potentially make Bevis Marks a less attractive tour group/visitor destination, wedding venue and function/café venue reducing business and income levels and having a detrimental impact on the financial sustainability of Bevis Marks. This is another relevant aspect highlighted in Historic England's good practice advice on setting:

Setting and economic viability

.....the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.⁹

City of London Tall Buildings Policy

Bevis Marks Synagogue is located in one of two areas identified by the City of London as *not inappropriate* for tall buildings, namely the Eastern Cluster which is considered the most appropriate area for a *group* of tall building developments. The City selected the Eastern Cluster area on the basis that it is less constrained by views protection policies. The City of London recognises, however, that **all** locations within the City are sensitive to tall buildings, and point 3 of the Core Strategic Policy CS7: Eastern Cluster (*City of London Local Plan 2015*) states that tall building developments within the Eastern Cluster must adhere to 'the principles of sustainable design, **conservation of heritage assets and their settings**' as well as taking account of their effect on the wider London skyline and protected views.

The City of London must also determine planning applications in accordance with the relevant policies set out in the Mayor of London's *London Plan (2016)*. These include 7.7 Location and Design of Tall and Large Buildings which states that '...tall buildings should not affect their surroundings adversely in terms of ...overshadowing...' and 7.8 Heritage Assets and Archaeology which states amongst other things that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'

⁸ Ibid. p.4

⁹ Ibid. p.6

The TVBHA places value on the ‘modern character’ of this part of the City. It should be acknowledged, however, that tall buildings of the scale of The Tulip and 100 Leadenhall (in excess of 200m AOD) have only been a feature of the City of London in the 21st Century, and even buildings in excess of 100m AOD were rare before the 1980s¹⁰. This is a very short period in the long history of Bevis Marks Synagogue. The individual and cumulative effects of these tall building developments on the significance of relatively diminutive heritage assets like the Synagogue and its setting, were not factored into the City’s identification of the Eastern Cluster and there was no specific consideration of the Synagogue in the City of London Tall Buildings Evidence Paper (2010).

The Significance of Bevis Marks Synagogue

The following overall Statement of Significance is taken from the Bevis Marks Synagogue Conservation Plan (Caroe Architecture Ltd):

Bevis Marks Synagogue is a Grade I listed building of 1699-1701, red brick, steep roofed, a major single volume galleried interior, original ‘Ark’ (Ehal), as well as original benches and related furniture, Bevis Marks is the oldest Synagogue in use in the UK and has remained in continuous use since 1701. No other Synagogue in Europe has this continuity of practice, of community, of building, of collections and minhag. The Synagogue is widely regarded by architectural historians as a building of national and international significance.¹¹ The Grade I listing places Bevis Marks in the highest category of importance among designated buildings - on a level with St Paul’s Cathedral and the Tower of London.

Widely recognised both within and without the Jewish community Bevis Marks is the repository of a layered inheritance. This consists of the building, its Courtyard setting, and the space and fittings it contains, as well as the associated important and irreplaceable physical collections (Torah scrolls, pictures, ritual silver, textiles and furniture) and a significant intangible heritage – minhag – of customs and melodies used in worship, handed down since the re-establishment of the Jewish community in England in 1656.

It is this extraordinary combination of significance to the history of Anglo-Jewry, the historic and little altered architecture, as well as continued daily use for prayer and heritage that is the heart of the significance and value of Bevis Marks Synagogue. This brings the overall significance of the building and site as a whole up to the Exceptional level, meaning it is of international significance.

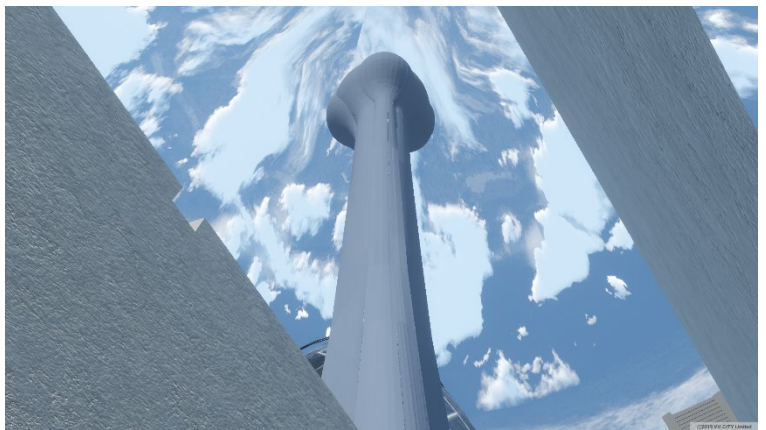
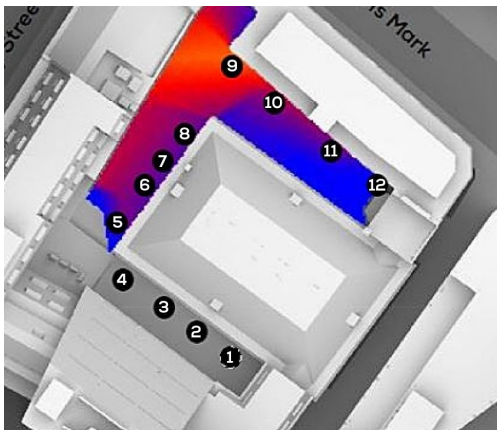
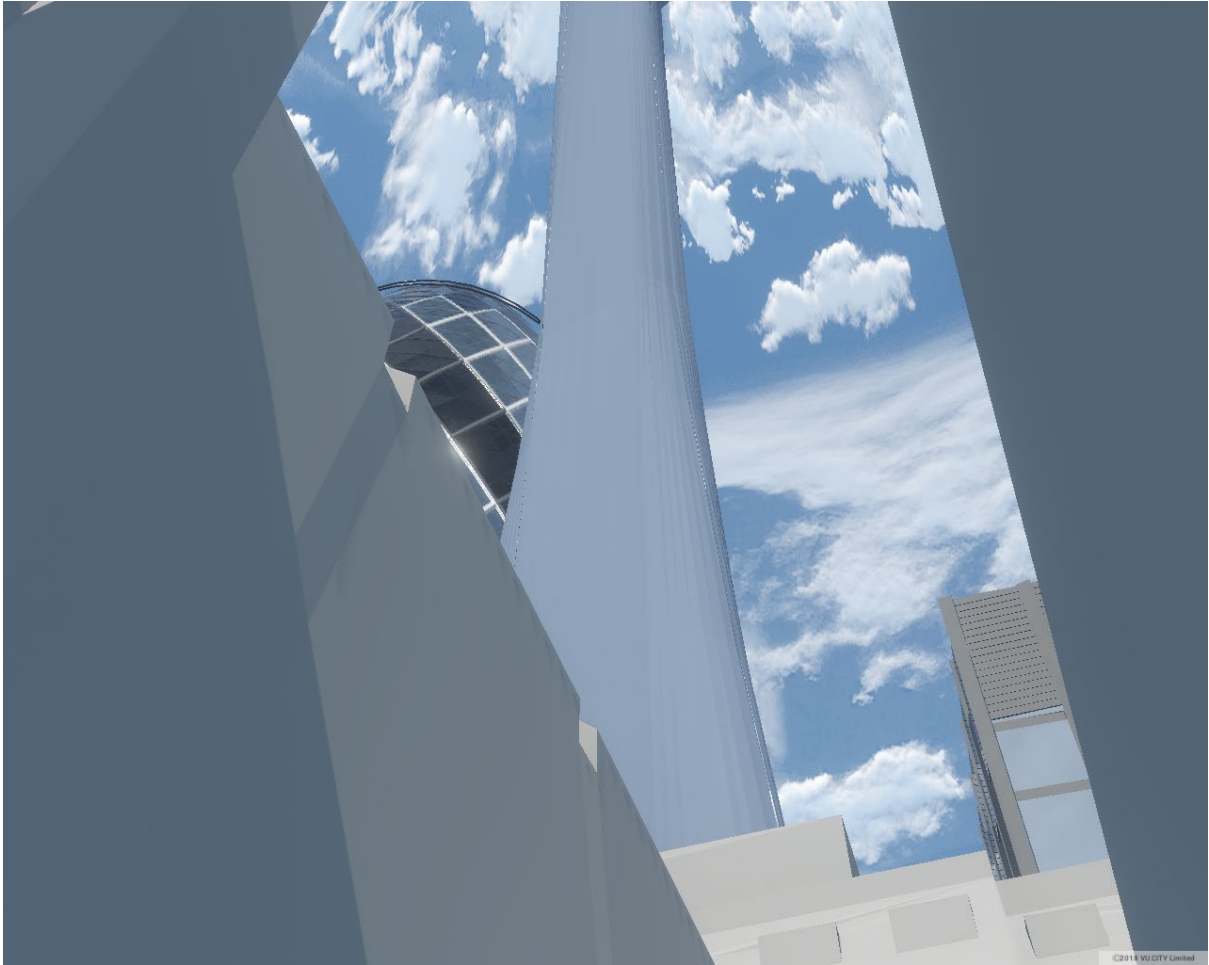
Overall significance of Bevis Marks Synagogue: Exceptional (International)

¹⁰ Buildings in excess of 100m AOD completed by 1980 include 1 Undershaft (1970), Barbican’s Lauderdale, Cromwell and Shakespeare Towers (1972), 99 Bishopsgate (1976), and 25 Old Broad Street (completed 1980). Before the start of this century, they were joined by 6-8 Bishopsgate (1982), the Lloyd’s Building (1986), 125 London Wall (1992) and 200 Aldersgate Street (1992).

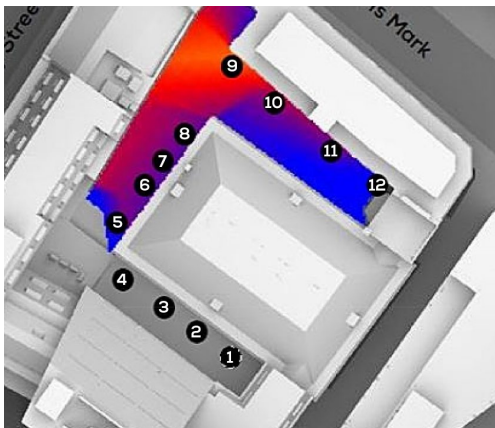
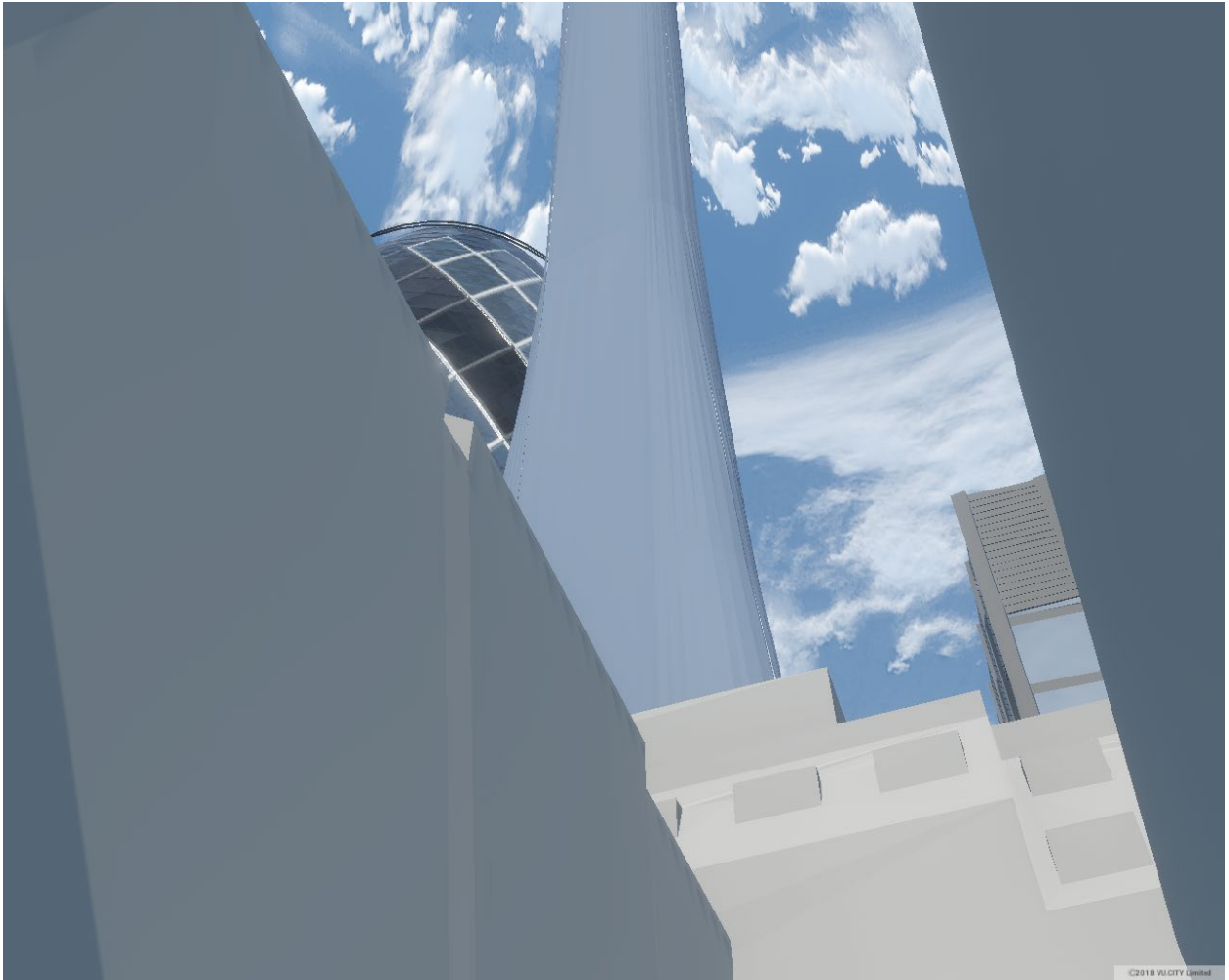
¹¹ Dr Sharman Kadish, and various others

Appendix – Additional Views 1-12 from within the Courtyard and Annexe Building

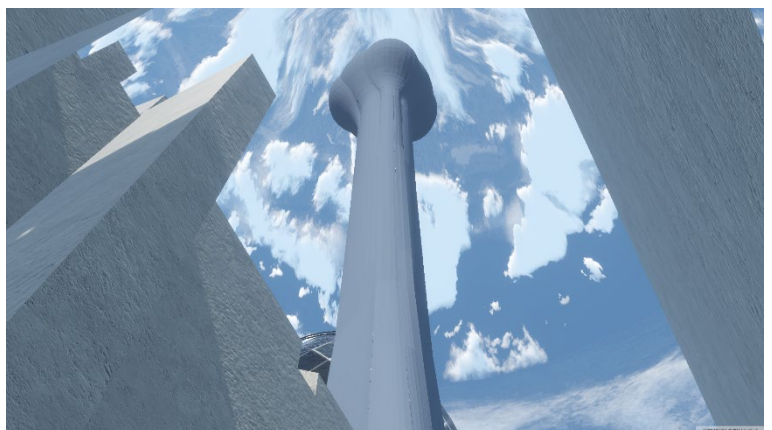
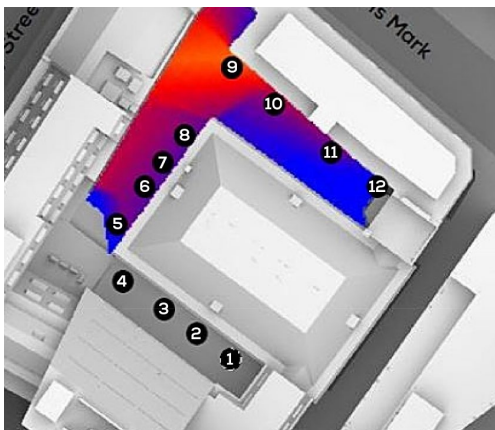
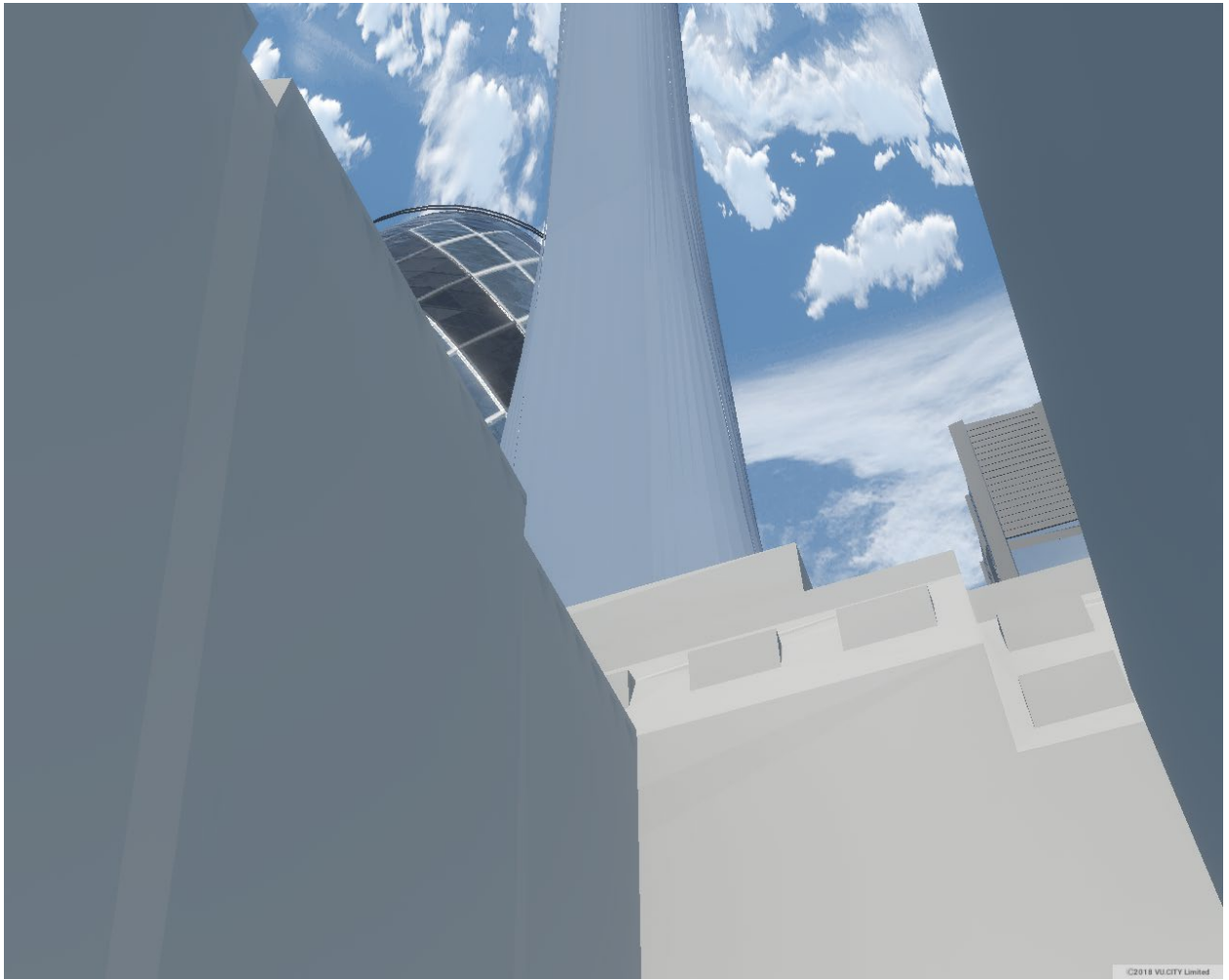
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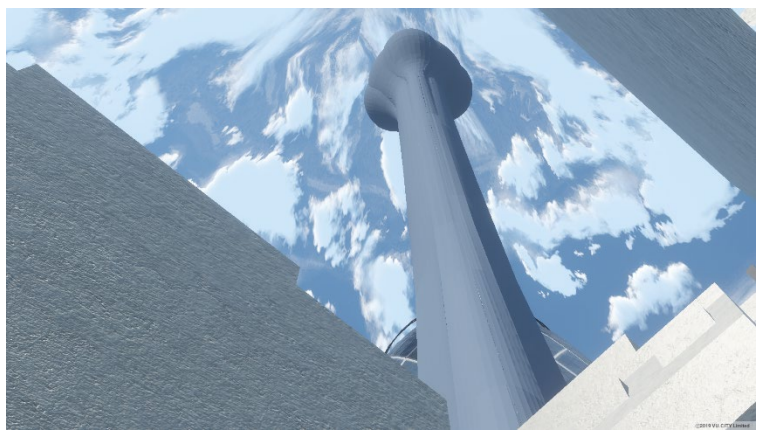
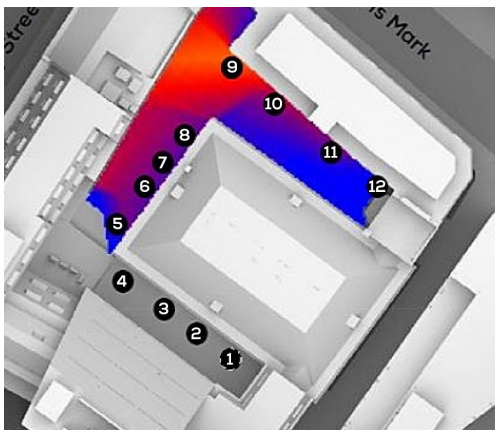
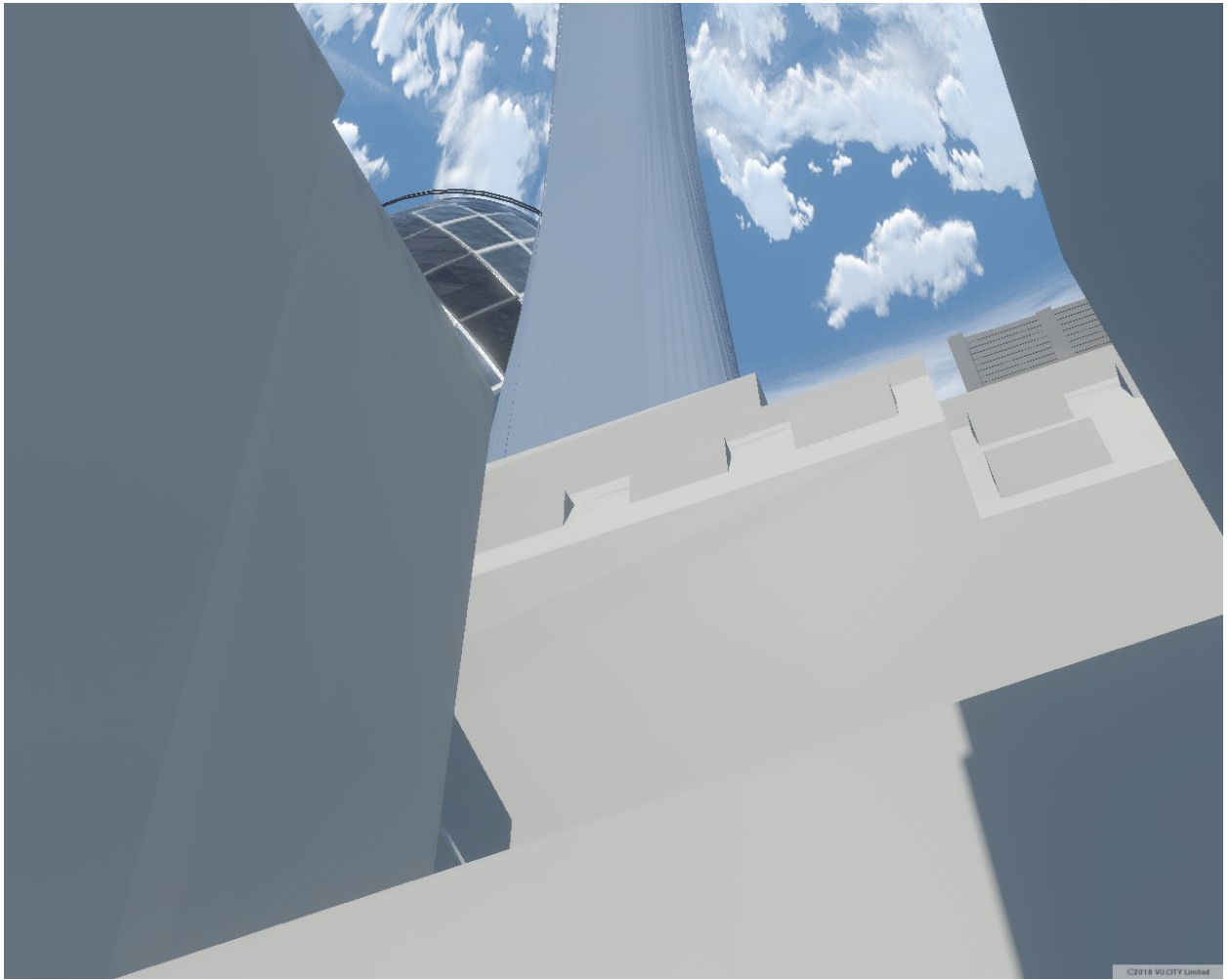
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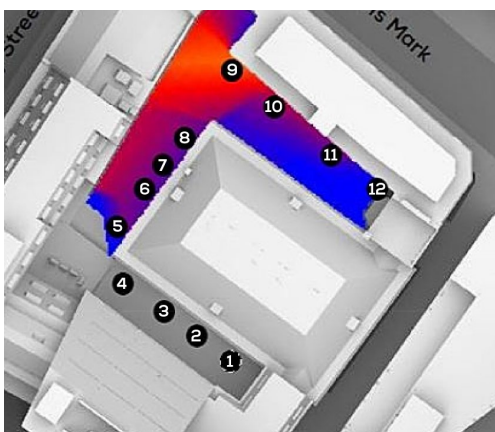
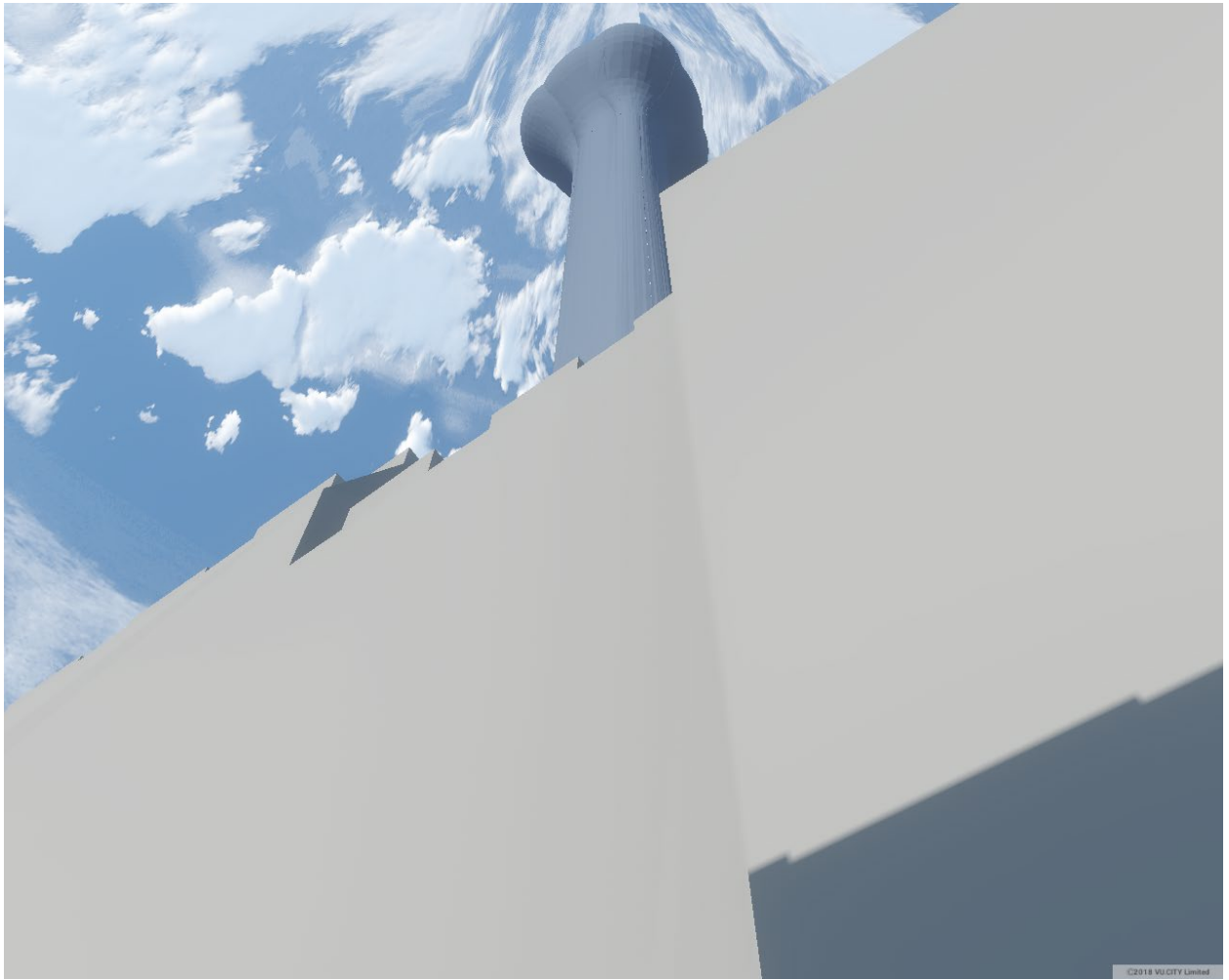
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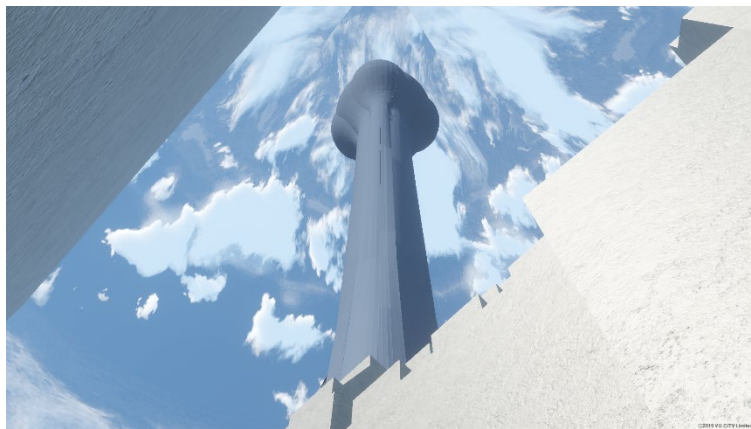
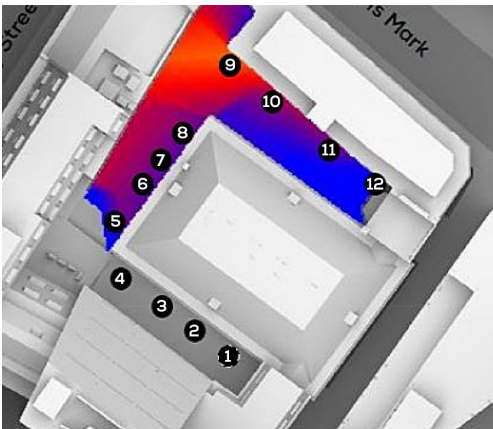
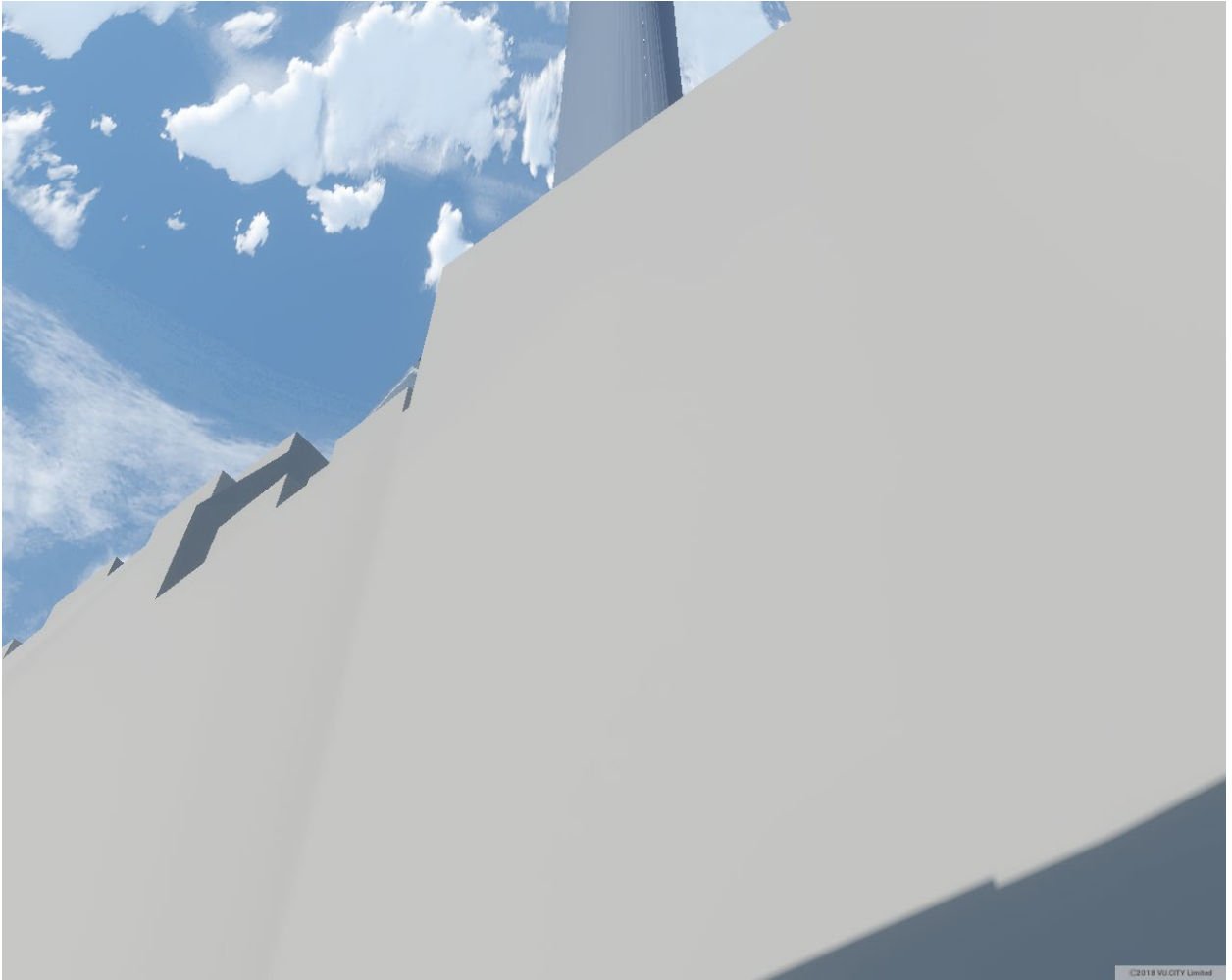
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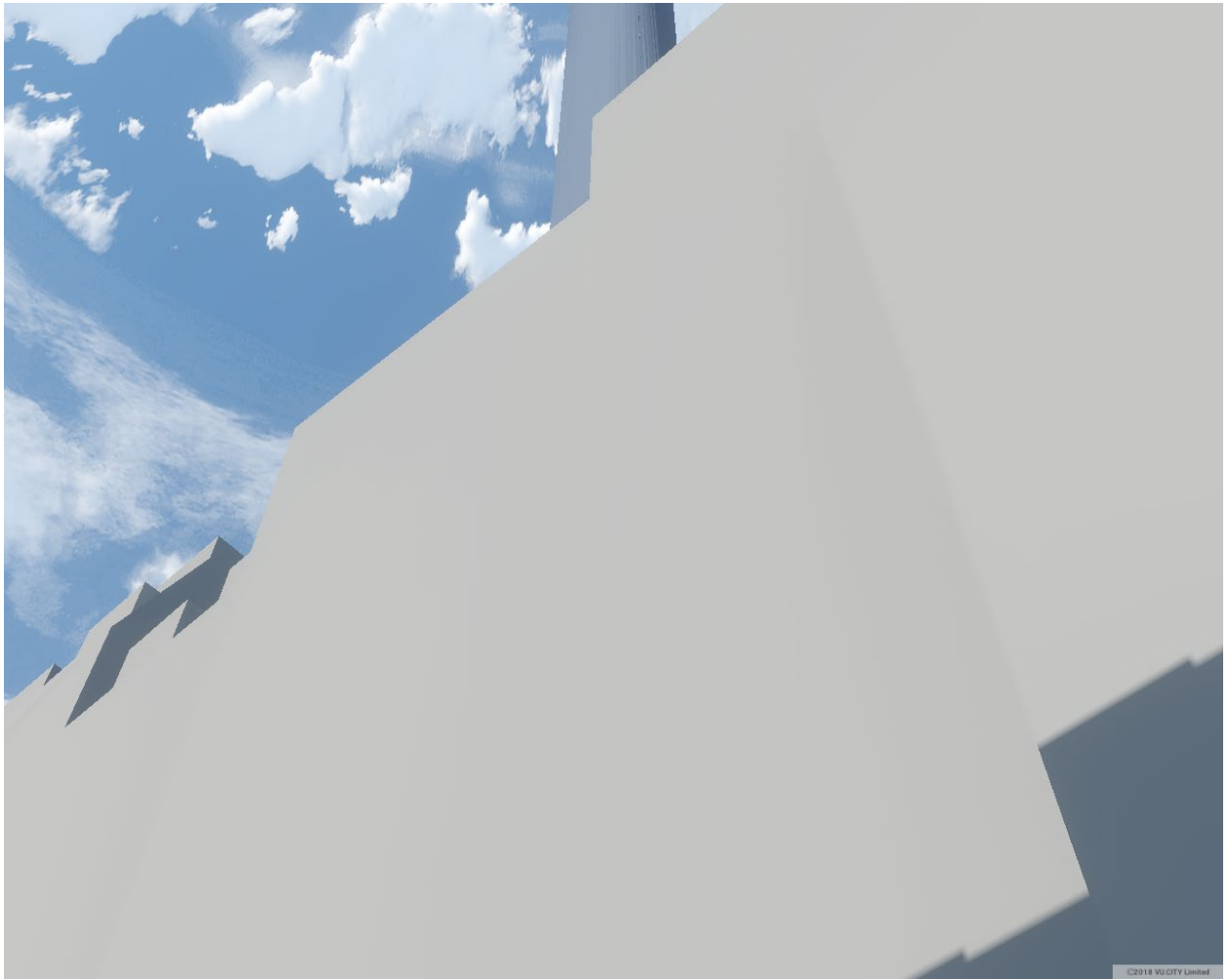
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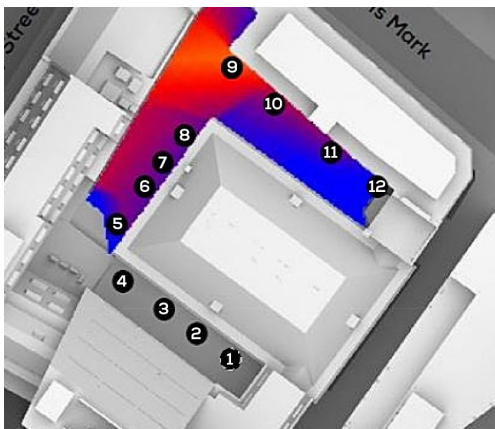
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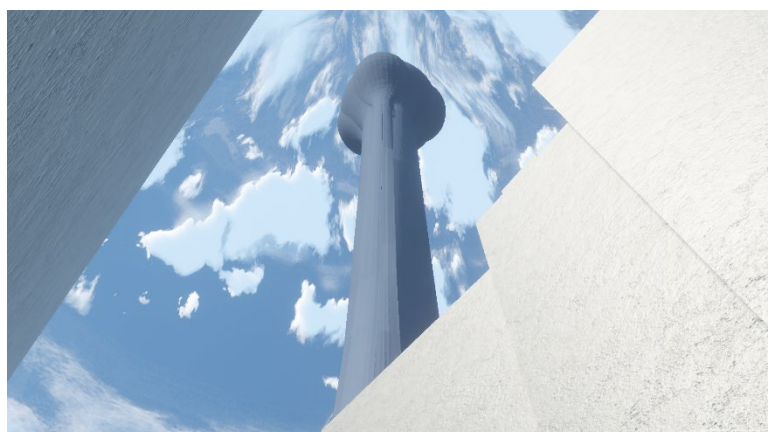
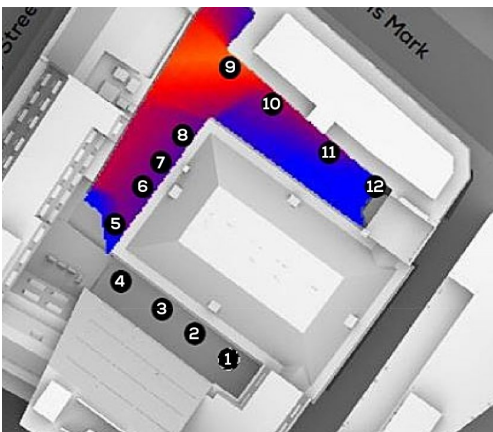
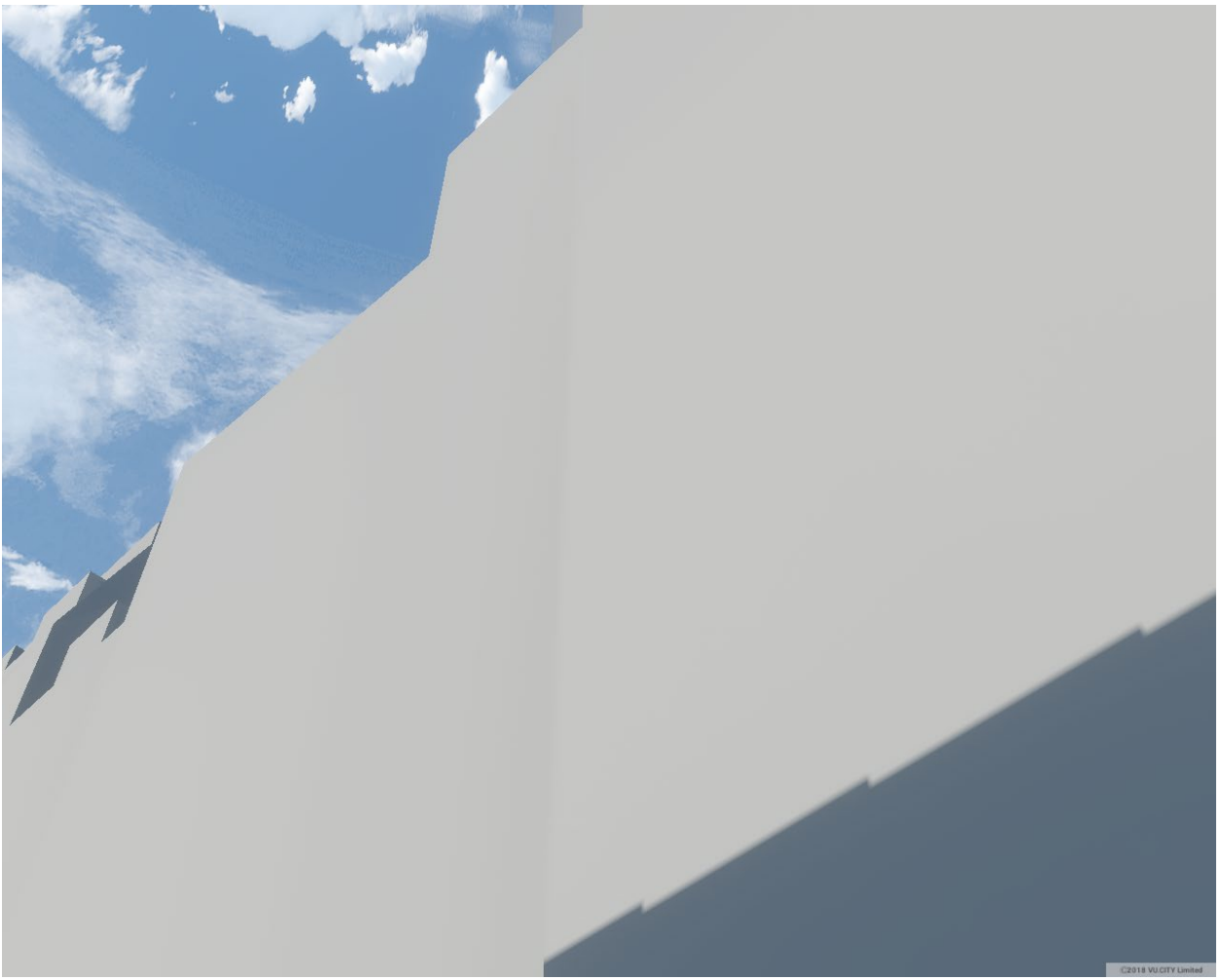


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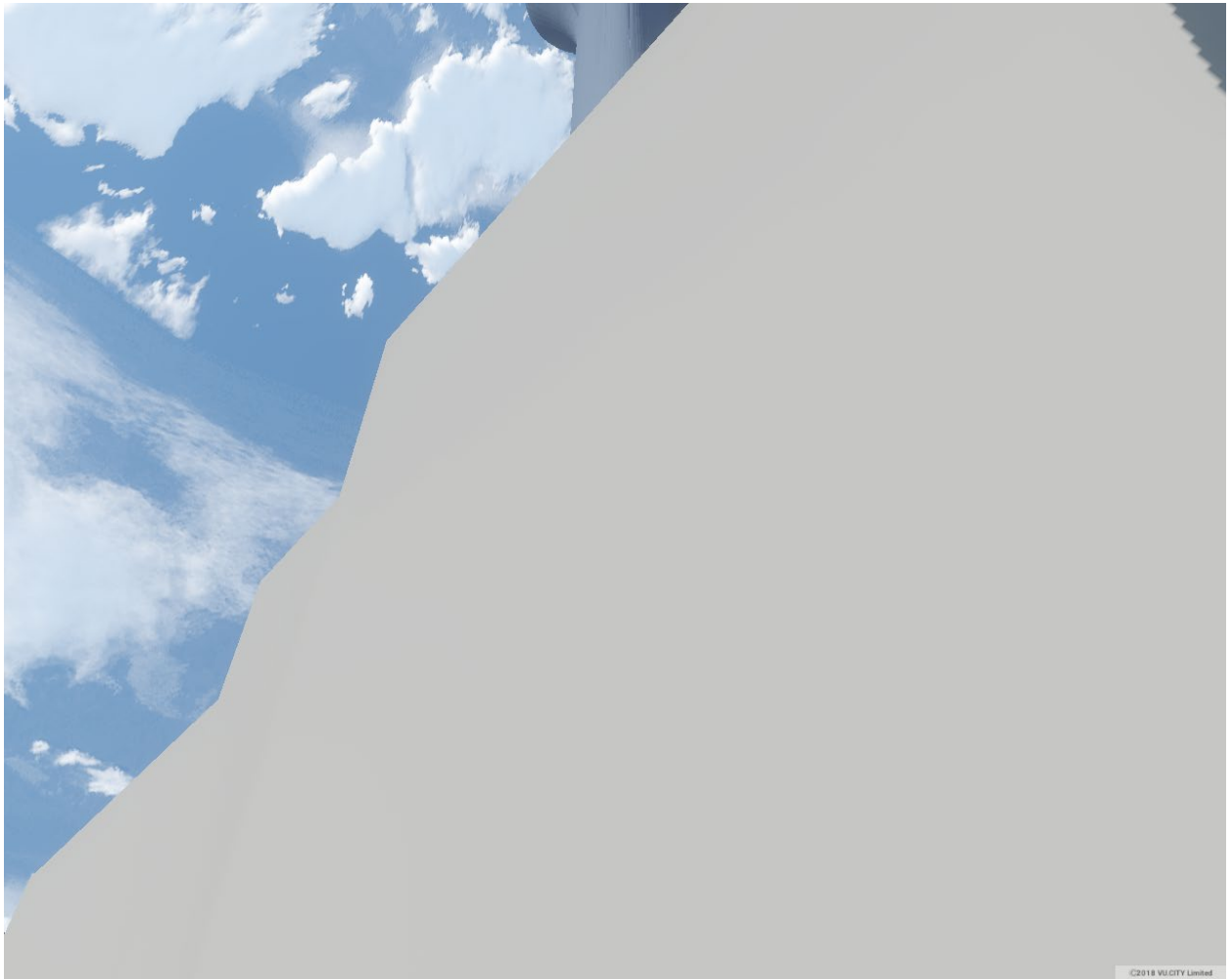


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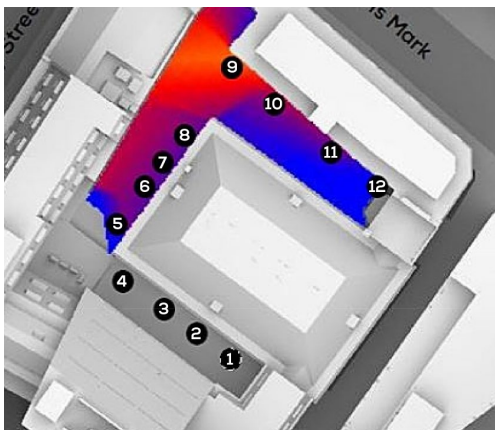
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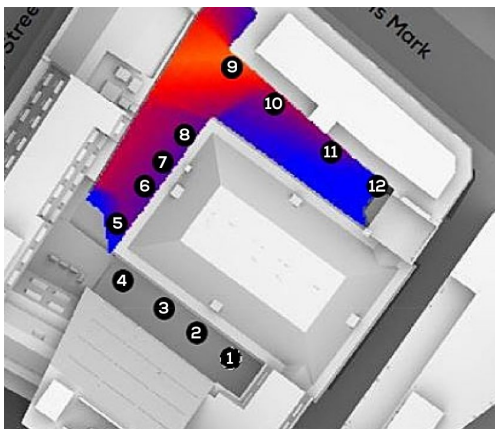
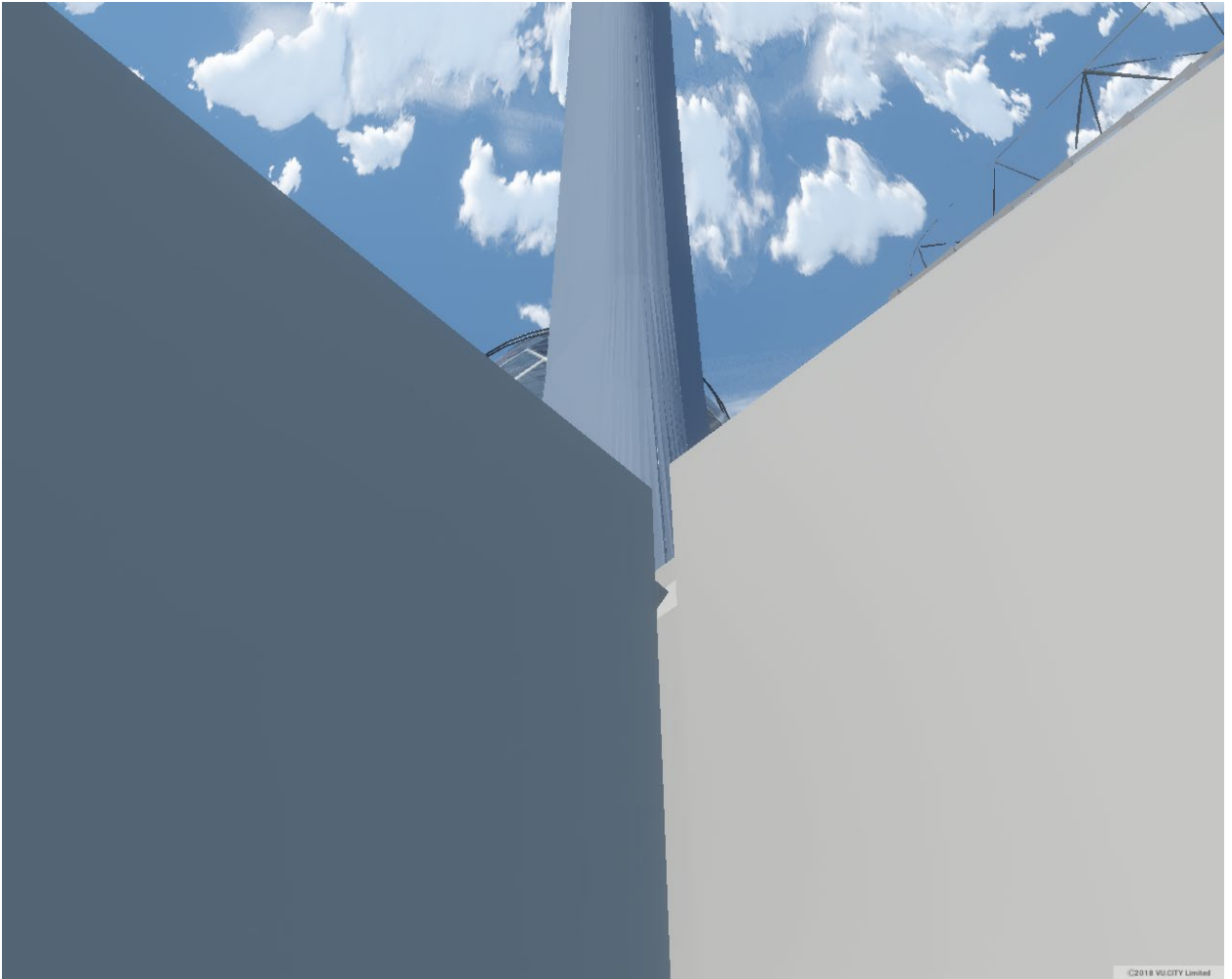
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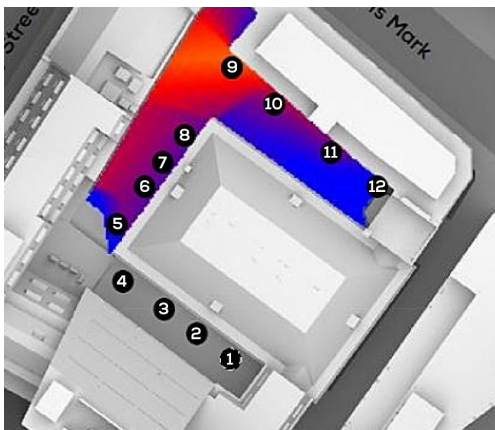
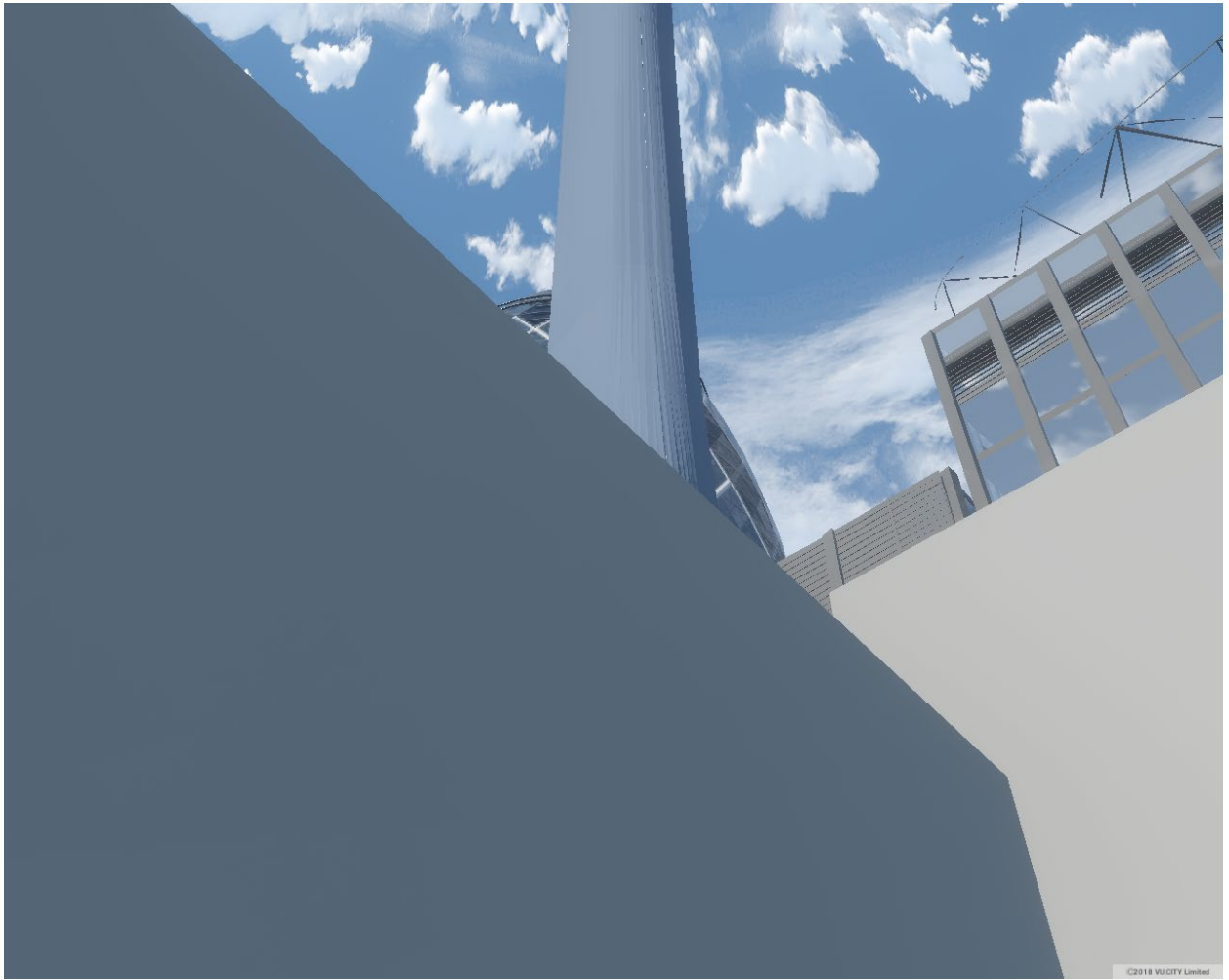
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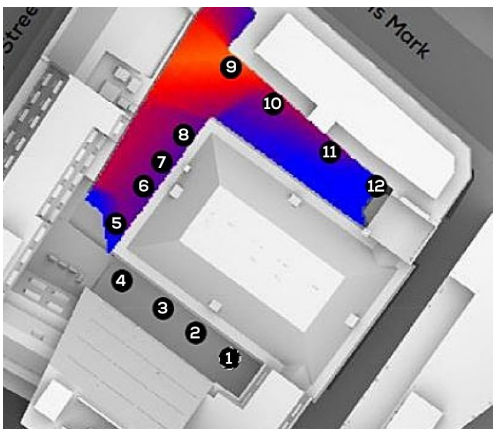
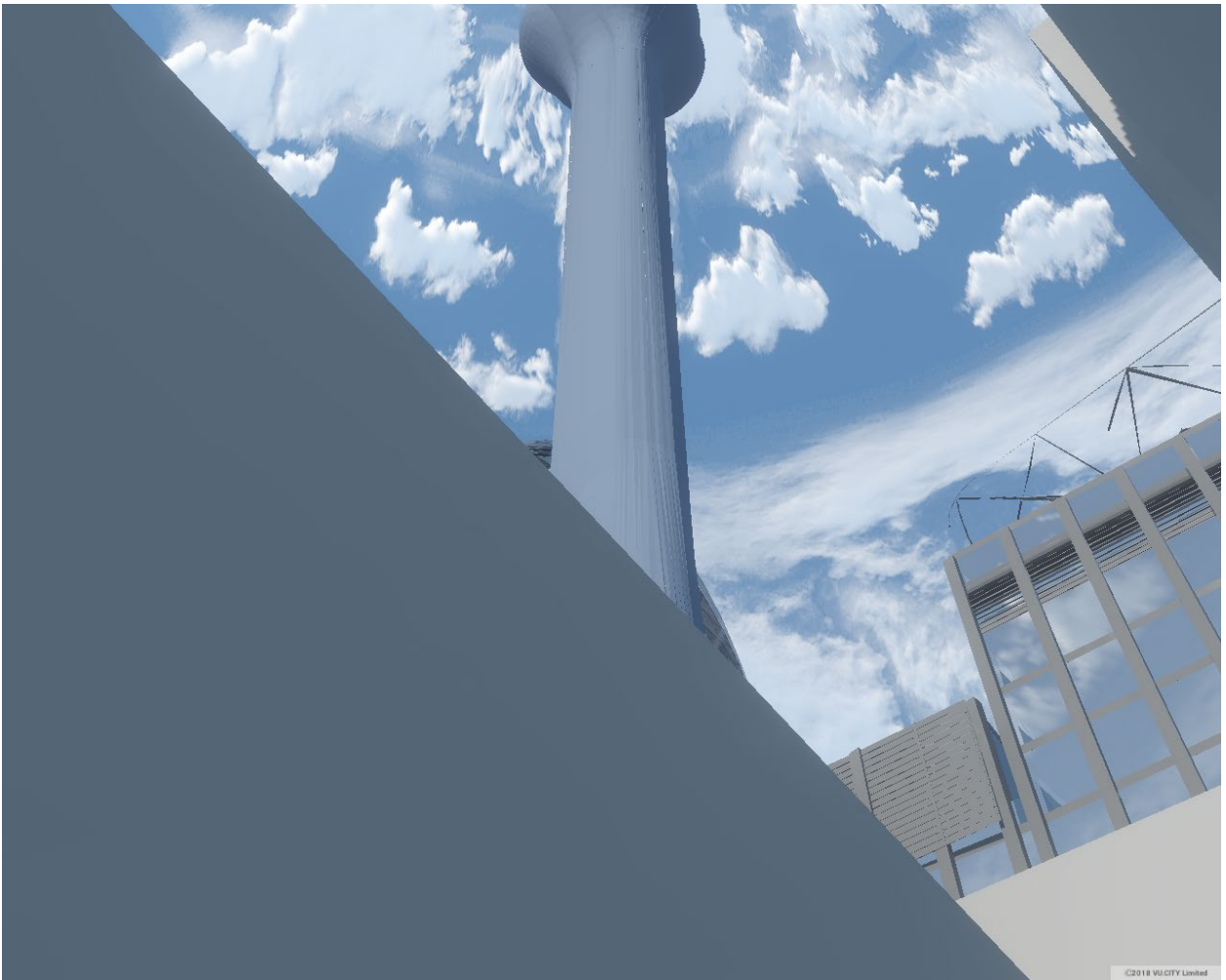
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#11



#12



Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

(RECONSULTATION - An amended plan has been received increasing the proposed area for education floorspace (from 190 sq m to 314 sq m.) - Supplementary supporting information has been submitted in the form of an Economic Impact Assessment)

Case Officer: Bhakti Depala

Customer Details

Name: Mr Jamie MacArthur

Address: ■ Terlings Avenue Gilston

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I support this very creative proposal. It will contribute to making the City of London an attractive place to work, visit, invest and live.

With Brexit around the corner, it's key that the City keeps pushing on. As someone who works, invests and has lived in the area, it's important to keep alive the city and offer something different.

Comments for Planning Application 18/01213/FULEIA

Application Summary

Application Number: 18/01213/FULEIA

Address: Land Adjacent To 20 Bury Street London EC3A 5AX

Proposal: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Diana Eltree

Address: London London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I really find it hard to believe it is from Foster. It's certainly a miss in terms of design!

I doubt that objections from the public can have an effect on stopping a mistake being built (the Walkie Talkie, 22 Bishopsgate, and many others). The countless pre-planning meetings seem to cement approval before any public consultation has taken place.

I don't object to a viewing tower being built here. I understand that there are free ones in the neighbouring skyscrapers anyway, but I do object to the design. When did London want to emulate Doha?

17 December 2018

Director of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

For the attention of Bhakti Depala, Case Officer

Dear Madam

LAND ADJACENT TO 20 BURY STREET, LONDON EC3 5AX
Planning application ref: 18/01213/FULEIA

Historic Royal Palaces is aware that the planning application above was received by the City of London on 14 November and validated on 19 November. We do not appear to have received notification of the application as one likely to affect the setting of the Tower of London World Heritage Site (WHS), but we write nevertheless to offer comments on the proposal.

As guardians of the Tower of London WHS, we believe that the so-called 'Tulip' development would have a seriously damaging effect on aspects of the 'Outstanding Universal Value' 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 taken into account in the Council's determination of the application.

The proposed development adjoining 30 St Mary Axe (popularly known as 'the Gherkin') would be sited to the north-west of, and little more than 600m from, the Tower of London WHS and would form a vertical cliff edge to the eastern side of the City Corporation's growing 'Eastern Cluster' of tall buildings. The proposal, for a very tall structure (305.3m overall), consisting of a 12-storey glass pod surmounting a curved concrete stem, is of considerable concern to Historic Royal Palaces. We believe that, due to its great height, exotic and consciously eye-catching form and proximity to the Tower, the proposed 'Tulip' would significantly increase existing



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Hampton Court Palace
Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle

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We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers.

visual damage to the western setting of the WHS, challenging the iconic status of the Tower as a symbol of royalty and power and further diminishing the historic dominance of the White Tower, thus harming key attributes of the Outstanding Universal Value (OUV) of the WHS.

A detailed heritage impact assessment (HIA) has been submitted in support of the planning application. This HIA states, in the opening paragraph of its *Non-Technical Summary* (NTS), that 'The Proposed Development has been carefully designed through a process of pre-application consultation with stakeholders to respond positively, in concept, scale and mass, to the Tower of London World Heritage Site.' The stakeholder consultation did not include Historic Royal Palaces, as confirmed in section 3.3 Consultation & Stakeholders of the *Design and Access Statement*. We were shown the proposal in its final form just two weeks before the formal planning application was submitted and disagreed strongly with this statement, for the reasons stated in the preceding paragraph.

The NTS summarises the 'relevant attributes' of the OUV of the Tower WHS (that is, those that could be affected by changes to its wider setting) as '...[the Tower's] appreciation as an internationally famous monument, its landmark siting and the physical dominance of the White Tower'. These are three of the 'attributes' identified in the *Tower of London WHS Management Plan 2016* as features or relationships that express, or are associated with, the Tower's OUV, either tangible or intangible. We would not disagree with the brief summary of relevant attributes in the NTS.

We do, however, disagree fundamentally with the conclusion in the third paragraph of the NTS that only one of these attributes, the physical dominance of the White Tower, would be affected by the proposed development - and then essentially only in one view, the *London View Management Framework* (LVMF) view 10A.1 from the north bastion of Tower Bridge looking upstream. It is acknowledged, both here and in the subsequent analysis of this view (HIA view 08, pages 28-9) that '...A degree of 'harm' in NPPF terms would therefore be caused to the appreciation of the physical dominance of the White Tower seen from LVMF Assessment Point 10A.1, which could adversely affect the appreciation of this attribute of OUV *in this one view*. Other views contributing to the appreciation of the physical dominance of the White Tower would not be harmed and *none of the remaining*

relevant attributes of Outstanding Universal Value would be harmed (emphasis added).

The degree of harm caused by the proposed development in LVMF view 10A.1 is assessed as 'less than substantial' in NPPF terms, although the magnitude of change is evaluated as 'major' and the significance of likely effect as 'very major, adverse'. The NPPF (July 2018) 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, *irrespective of the degree of potential harm to its significance* (emphasis added). The more important the asset, the greater the weight should be' (NPPF paragraph 189). In other words, 'less than substantial harm' to a heritage asset of the highest significance, such as a WHS (NPPF paragraph 182), does not mean that less than great weight can be given to ensuring the asset's conservation, or that the effect on the asset's significance can be considered minor or unimportant.

The NPPF makes clear that the degree of impact is proportionate to the significance of the designated heritage asset affected. We consider, therefore, that the impact of the proposed development on the OUV of the Tower in this view has been underestimated in the HIA and that it would affect not only the physical dominance of the White Tower, but also the property's perceived separateness from the City and its strategic siting on the river, dominating the riverside. The argument, in the main text relating to this view, that the proposed development would be seen in relation to a cluster of tall buildings where '...the balance is already weighted in favour of the dominance of the City', so that the incremental change resulting from the proposed development would not fundamentally change that balance, is simply not acceptable in planning policy terms. Existing harm can never justify further harm.

The proposed development would also, in Historic Royal Palaces' view, cause serious harm to the Tower's status as 'an internationally famous monument' and this key attribute of the WHS' OUV, in particular, would be adversely affected. The Tower has been symbolic of royalty and royal power since William the Conqueror and is one of England's best-known structures. Its distinctive silhouette as seen in the world-famous view from the south bank of the Thames (LVMF protected views 25A.1-3) is recognised internationally; the White Tower has

become an iconic image of London, frequently used in publicity by organisations such as Visit Britain.

Historic Royal Palaces considers that the proposed 'Tulip' development would have a major, harmful effect on the setting of the Tower WHS in these views. The height, proximity and self-consciously dramatic design of the proposed development would diminish the Tower WHS, reducing it to the appearance of a toy castle, set down between the ever-growing Eastern Cluster (in which the proposed development would be as tall as the tallest element) and Tower Bridge. The HIA nevertheless states that, 'The White Tower's distinctive and iconic silhouette, seen from the south bank of the Thames would not be altered by the Proposed Development and the White Tower would continue to dominate its immediate surroundings within the Tower of London World Heritage Site's local setting.' It should be noted that the local setting of the WHS in this view extends only a short distance, to the west side of Tower Hill. The images included in the HIA (views 18 - 20) also show only part of the LVMF panorama from the Queen's Walk: HIA view 18 includes the White Tower, but it is not shown in views 19 and 20 (despite the accompanying text stating that it appears '...against clear sky on the right edge of the frame'). The diminution of the significance of the White Tower in its wider setting cannot be fully appreciated in these partial views. The full panorama is shown on page 28 of the *Design and Access Statement*, however, making the point.

Views towards the application site from within the Tower would also be seriously affected by the proposed development, as illustrated, for example, in views 26, 29, 30 and 31 in the HIA. In view 26, from the Inner Ward, the proposed 'Tulip' development would appear above the eastern end of the Chapel Royal of St Peter ad Vincula as something distinct and separate from the existing and consented buildings of the Eastern Cluster, which already intrude in the view. From this angle, perspective would exaggerate the height of the proposed structure, but this is not immediately apparent due to the screening effect of a foreground tree in full leaf. The view in winter, or should the mature tree in question be lost, would be very different, with the 'Tulip' providing an alien and distracting object, clearly seen against open sky above the chapel roof. The HIA acknowledges that the 'magnitude of change resulting from the proposed development' in this view would be 'major', but assesses the 'significance of likely

cumulative effect', as 'major, neutral'. This conclusion appears neither justified, nor credible.

Other views north-west from within the Inner Ward are similarly affected by the proposed development. In views 29 from the northern Inner Curtain Wall and 31, from the Byward Tower entrance to the Tower, the proposed 'Tulip' development, would stand slightly apart from the commercial buildings of the Eastern Cluster, appearing as tall as the tallest building in the group. The HIA evaluation of the 'significance of likely cumulative effect' of the proposed development on both of these views is 'major, beneficial', on the basis that the 'Tulip' would 'contribute a high-quality new landmark element to the skyline of the Eastern Cluster' and that the 'modern high-rise commercial character of the background setting of the WHS would be preserved' (HIA page 52). Historic Royal Palaces strongly disagrees: we consider that the height and attention-seeking nature of the 'Tulip's' design would make it the most visually intrusive element of the Cluster in these views and that its effect would be both major and adverse.

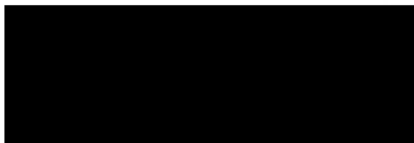
Our conclusion is that the subject of the application, the proposed 'Tulip' development, would be extremely damaging to the setting of the Tower of London WHS for the reasons we have set out above. In particular, we believe it would diminish a key attribute of the Tower's Outstanding Universal Value, challenging the Tower's eminence as an iconic, internationally famous monument as seen in the protected LVMF view 25A.1-3. We do not believe that the claimed public benefit of the development, which would neither offer enhancement of the WHS, nor fulfil a planning policy objective, would outweigh the potential harm to the WHS. It would therefore conflict with national planning policy for the historic environment and the relevant policies in both the current London Plan and the City of London Local Plan.

Historic Royal Palaces therefore objects to the proposed development, which we believe would pose a serious risk to the status of the Tower of London as a WHS and we ask the City Corporation to refuse the application.

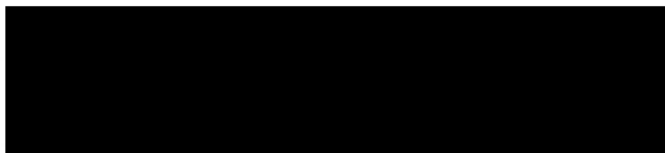
Our own objection aside, Historic Royal Palaces is of the view that the proposal should be referred to UNESCO's World Heritage Centre as a new construction likely to affect the OUV of a World Heritage property, in accordance with Paragraph 172 of the *Operational Guidelines for the Implementation of the World Heritage Convention*.

We note that, as stated in their comment letter of 06 December 2018, Historic England shares our view and has informed the Department of Digital, Culture, Media and Sport accordingly.

Yours sincerely



Deborah Bird MRICS
Property Manager and
Tower of London WHS
Co-ordinator
Direct Line 020 3166 6369
Email Deborah.bird@hrp.org.uk



Adrian Phillips Dip. Blg Cons. MRICS
Palaces and Collections Director
Direct Line 020 3166 6380
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Historic England

LONDON OFFICE

Ms Bhakti Depala
City of London
PO Box 270
Guildhall
London
EC2P 2EJ



Direct Dial: [REDACTED]

Our ref: P00996770

6 December 2018

Dear Ms Depala

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND ADJACENT TO 20 BURY STREET LONDON EC3A 5AX
Application No. 18/01213/FULEIA**

Thank you for your letter of 19 November 2018 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

We have been involved in providing advice on these proposals for several months, and a pre-application design similar to the submitted proposals was considered at this stage by our London Advisory Committee. The advice set out in this letter reflects our earlier pre-application advice to the application, which was informed by the advice of the London Advisory Committee. A summary of that position is set out below.

The proposed building, by virtue of its location, will form the eastern edge of the City's Eastern Cluster of tall buildings. This, combined with its height and form, means that the Eastern Cluster forms a sharp backdrop to the Tower of London when seen in the LVMF view from the north bastion of Tower Bridge. In our view, this sharp contrast, combined with the unusual eye-catching form of the proposed building, reduces the visual dominance of the Tower of London and harms an attribute of its Outstanding Universal Value, namely the Tower's role as a symbol of royal power set apart from the City of London and dominating its strategic riverside setting. We have not seen clear and convincing evidence that this harm would be outweighed by public benefits, and we therefore cannot support the proposals.

Historic England Advice

Significance

The designated heritage asset most affected by the proposals is the Tower of London, which is located around 630 metres south-east of the development site. The Tower is



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one of London's four World Heritage Sites and its significance, history and development are well known and form the basis of its Outstanding Universal Value (OUV). In summary, the OUV is based on a number of attributes, including (but not limited to) its strategic site and function as a fortress and gateway to London, illustrating both the protection and control of the city; the rare survival of a continuously developing ensemble of royal buildings from the 11th to 16th centuries and their symbolism of royal power; the outstanding example of late 11th century Norman military architecture. The Tower is also a Scheduled Monument containing a number of highly graded listed buildings and is within a conservation area.

The LVMF views from the North Bastion of Tower Bridge (10A.1) and Queen's Walk (25A.1) illustrate the Tower's setting and many of its attributes of OUV, including its role as a symbol of royal power set apart from the City of London. View 10A.1, more than any other, clearly shows the Tower's relationship with the developing Eastern Cluster. In this view, the Tower's strategic position along the river is clearly illustrated. As it has done for centuries, the Tower dominates its immediate riverside setting, but the towering modern (existing and consented) buildings of the Eastern Cluster rise sharply to the west. The visual contrast between the modern City of London and the historic Tower has been established for decades, but has intensified in recent years as the Eastern Cluster becomes taller and denser. The contrast is particularly notable in this view, which shows the City and Tower in close juxtaposition. View 25A.1 is from Queen's Walk on the South Bank further to the west. It shows the Eastern Cluster from the river, with the Tower noticeably further to the east. The Tower's OUV attribute of being set apart from the City of London is clearly illustrated in this view.

Proposals

The project is being financed by the current owner of 30 St. Mary Axe. The intention is to create a viable new visitor attraction in the City of London principally for the enjoyment of high level views over London. The proposals have been designed by Foster + Partners as a glazed 'tulip-shaped' pod atop a narrow concrete lift shaft. The height of the top of the pod will, at 305.3m AOD, match the height of the consented building at 1 Undershaft, which will be the tallest building in the City of London (only slightly lower than the Shard across the river in Southwark). The pod contains 12 floors of varying size and form. Level 3 will be used for educational use, and the top floors for bar and restaurants. The middle floors will be dedicated for the visitor experience of viewing and learning about London, its history and development. These floors will be set back from the glazed elevation, with a 'floating' skybridge walkway along the inside perimeter at level 4. The middle floors will be accessed by paid-for ticket holders and used for private events.

Policy

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings.



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Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 193 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional. In the case of Grade II* or Grade I listed or registered assets or World Heritage Sites, substantial harm or loss should be wholly exceptional (paragraph 194).

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

If the harm is substantial, or results in a total loss of significance, paragraph 195 states that local authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all four of the following criteria 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 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.

Policies in the London Plan for the protection of London's heritage are set out in 7.8-7.12. Between December 2017 and March 2018, the Mayor of London consulted on a new draft London Plan. This included policies on design, heritage and tall buildings. The following draft policies are relevant: Policy D8 (B) requires that tall buildings should be part of a plan-led approach; Parts C1 (a) (i) of the same policy relate to visual impacts on important local or strategic views; C1 (d) requires proposals to 'take account of, and avoid harm to, the significance of London's heritage assets and their settings'; C1 (e) provides policy protection for the Outstanding Universal Value of World Heritage Sites and C1 (f) gives protection to views from the River Thames. In March 2012 the GLA adopted 'London's World Heritage Sites-Guidance on Settings' as Supplementary Planning Guidance. The document includes a framework for assessing the potential impact of development on the setting and OUV of World Heritage Sites and assets within those sites.





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Notwithstanding the policy and guidance framework described above, it should be noted that the World Heritage Committee and its cultural heritage advisor ICOMOS (the international body based in Paris) interpret the World Heritage Convention in a way that places great weight on the need to avoid any harm to OUV. Only if it is clear that proposed development is essential and cannot occur without harm to OUV does ICOMOS concede in its 2011 Guidance on Heritage Impact Assessment that balancing harm against benefit is acceptable.

Position

The gradual intensification and densification of the Eastern Cluster of tall buildings has changed the visual relationship between the City and the Tower of London WHS in some views. The proposals will further change this relationship, creating a vertical 'cliff edge' to the Eastern Cluster when viewed from the north bastion of Tower Bridge (LVMF 10A.1), while the unusual form of the building, intended to be eye-catching, draws attention away from the Tower. In our view, the proposed new building would change the relationship between City and Tower to such an extent that the Eastern Cluster begins to visually challenge the dominance and strategic position of the Tower (both attributes of OUV), thereby causing harm to its significance.

This harm is primarily experienced in one view, but it is the view that best illustrates the relationship between the Tower and the City of London and thereby the attribute of OUV that relates to the strategic and dominant position along the river, set apart from the mercantile City. The proposed building would diminish the sense of dominance of the Tower, resulting in harm to the significance of the World Heritage Site.

A further impact on the significance of the Tower occurs in the view from the Inner Ward towards the Chapel Royal of St. Peter ad Vincula. Here, the top of the 'Tulip' would be visible above the roofline of the Chapel, adding to the modern visual intrusions of the tall buildings at 22 Bishopsgate (under construction) and 1 Undershaft (consented) above the chapel roofline when these buildings are completed. The appearance of modern tall buildings above this roofline causes harm, as it diminishes the self-contained ensemble of historic buildings currently largely unimpeded by signs of the modern city beyond. This is not a pristine view, but each time a new building appears in the view, it contributes to a diminution of the impact of the sense of history in this special place. Our view is that the harm here is less than substantial.

We also note that there are already viewing platforms in the City of London, including of course Wren's historic Monument, with which the proposed new development would compete.

NPPF policy states that any harm to the significance of a designated heritage asset should require clear and convincing justification (paragraph 194). In cases where proposals lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposal (paragraph 196).

Recommendation

Historic England objects to the application on heritage grounds.



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It is for your authority to weigh the harm identified above against any public benefits of the scheme when they consider formal applications. We also urge you to consider the documents submitted with the application to ensure that the Historic Impact Assessment is in accordance with ICOMOS guidance.

Based on the documents submitted with the application, Historic England is not convinced that the harm to the significance of the Tower of London, a World Heritage Site of international importance, could be outweighed by public benefits. We have informed the DCMS of our position, and understand that they intend to send a paragraph 172 notification to the World Heritage Centre.

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



Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: 



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Bhakti Depala
Development Division
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Our ref: GLA/4868/01/SW
Your ref: 18/01213/FULEIA
Date: 14 January 2019

Dear Ms Depala

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Land adjacent to 20 Bury Street
Local Planning Authority reference: 18/01213/FULEIA**

I refer to the copy of the above planning application, which was received from you on 19 November 2018. On 14 January 2019, the Mayor considered a report on this proposal, reference GLA/4868/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 84 of the above-mentioned report.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, Tel: 020 3054 7027, Email: gavinmchlaughlin@tfl.gov.uk

Yours sincerely



RP

John Finlayson
Head of Development Management

- cc Unmesh Desai, London Assembly Constituency Member
- Nicky Gavron, Chair of London Assembly Planning Committee
- National Planning Casework Unit, DCLG
- Lucinda Turner, TfL
- Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ

Land adjacent to 20 Bury Street

in the City of London

planning application no. 18/01213/FULEIA

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas, restaurant/bar area, and retail use at ground floor level; construction of a two storey building comprising visitor entrance and public roof garden.

The applicant

The applicant is **Bury Street Properties** and the architect is **Foster + Partners**.

Strategic issues summary

Principle of development: The principle of a visitor attraction within a CAZ location would complement the strategic functions of the CAZ. However, the proposal fails to provide free to enter publicly accessible viewing areas and is therefore contrary to London Plan Policy 7.7 and Policy D8 of the draft London Plan. (Paragraphs 17-24)

Historic Environment: The development would compromise the ability to appreciate the Outstanding Universal Value of the Tower of London World Heritage Site and would cause harm to the historic environment. Accordingly, the application does not comply with London Plan policies 7.7, 7.8, 7.10, 7.11 and 7.12 and Policies D8, HC1, HC2, HC3 and HC4 of the draft London Plan. (Paragraphs 39-68)

Design: GLA officers have significant concerns with the design approach. The height appears unjustified and the introduction of significant expanse of solid and inactive building frontage would appear incongruous in the existing faceted context of the Eastern Cluster, drawing significant attention in this heritage sensitive location. The site layout and loss of public realm at street level is also of significant concern. (Paragraphs 25-35)

Strategic Views: The appearance of the proposed development within LVMF views 10A.1 and 25A.1, 2 and 3 would cause harm to these strategic views, contrary London Plan Policies 7.11 and 7.12 and Policies HC3 and HC4 of the draft London Plan (Paragraphs 36-38 and 47-59).

Transport: The proposals are considered to result in a poor quality, unwelcoming and unnecessarily confined pedestrian environment contrary to Policy 6.10 of the London Plan and Policy D1 of the draft London Plan. The proposals would not reflect the Healthy Streets approach detailed within Policies T2 and T4 of the draft London Plan. The level of cycle parking would not accord with draft London Plan Policy T5. (Paragraphs 72- 80).

Further information on **Energy** is required. (Paragraphs 70-71)

Recommendation

That City of London be advised that the scheme does not comply with the London Plan and draft London Plan for the reasons set out in paragraph 84 of this report.

Context

1 On 19 November 2018, the Mayor of London received documents from the City of London notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the City of London with a statement setting out whether he considers that the application complies with the London Plan and draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C(c) of the Schedule to the 2008 Order:

- *1C(c) 'Development which comprises or includes the erection of a building of more than 150 metres high and is within the City of London'*

3 Once the City of London has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The proposals relate to a site within the Eastern Cluster of the City of London currently occupied by 20 Bury Street, a 6 storey building, and an area of public realm at the base of, and surrounding much of, 30 St Mary Axe - colloquially known as the Gherkin. The site is bound by 100 Leadenhall Street to the south east, Bury Street to the south west, Bury Court to the north east and St Mary Axe to the north west.

7 The surrounding area contrasts numerous modern tall buildings with the low rise historic buildings of the City of London. The site is adjacent to the Grade II listed No. 38 St Mary Axe, to the north west of the Grade II* listed Holland House, and to the west of the Grade I listed Bevis Marks Synagogue and Grade I listed St Botolph's Church. Aside from the immediately adjacent 41 storey 30 St Mary Axe building, other notable tall buildings in close proximity include 122 Leadenhall Street (also known as the Cheesegrater), containing 48 levels of predominantly office accommodation to the west of the site and 110 Bishopsgate (also known as the Heron Tower), containing 46 levels of predominantly office accommodation to the north west. A number of other tall buildings are also either under construction, or have recently been granted planning permission. These include, 22 Bishopsgate (62 storeys), 52 Lime Street (39 storeys) and 100 Bishopsgate (37 storeys) which are under construction. In addition, 1 Undershaft (73 storeys), 6-8 Bishopsgate (52 storeys) and 100 Leadenhall Street (57 storeys) currently have 'resolutions to grant' planning permission.

8 Although the site is not within a conservation area, it is adjacent to the St Helens Place Conservation Area and Bishopsgate Conservation Area. The site is also within close proximity to the Tower of London World Heritage Site (WHS) and St Paul's Cathedral (Grade I listed).

9 The site has an excellent Public Transport Access Level (PTAL) rating of 6b (on a scale of 0-6b where 6b is the most accessible). Bus stops within 300m serve routes 8, 25, 26, 35, 47, 48, 100, 149, and 242 providing connections to key destinations such as Oxford Circus, London Bridge, Tottenham Court Road, Waterloo, Clapham Junction, Dalston, and Hackney. The nearest station is Aldgate approximately 330m east of the site, giving access to the London Underground (LU) Circle, and Metropolitan lines. Liverpool Street station approximately 400m northwest gives access to the Central, Circle, Hammersmith & City, and Metropolitan LU lines, TfL Rail, and national rail services. It will also be served by the Elizabeth Line (Crossrail), planned to be operational from autumn 2019.

10 The nearest part of the Transport for London Road Network (TLRN) is A10 Bishopsgate, approximately 250m northwest of the site. The nearest part of the Strategic Road Network (SRN) is Bevis Marks approximately 60m northeast. The nearest cycle docking station is at St Mary Axe, 100m to the south and provides 21 docking points.

Details of the proposal

11 The proposal would see the demolition of existing buildings and structures (including 20 Bury Street and the existing servicing ramp from St Mary Axe) and the construction of a new mixed-use visitor attraction, comprising ground and basement levels, supporting structure, lifting equipment and service risers; and a 12-storey high-level visitor area which includes a mix of leisure, education, bar, restaurant and back of house uses. The proposal would also include a distinct pavilion building serving as the visitor entrance and including a publicly accessible rooftop terrace, short and long stay cycle parking provision, two servicing and delivery vehicle lifts and a separate retail unit.

12 The breakdown of the proposed floorspace is as follows:

Use	GIA (sq.m.)	GEA (sq.m.)
Visitor attractions (sui generis)	4,512 sq.m.	4,879 sq.m.
Restaurant/Bar (A3/A4)	1,454 sq.m.	1,535 sq.m.
Retail (A1/A3)	9 sq.m.	11 sq.m.
Ancillary (basement/plant)	8.910 sq.m.	11.016 sq.m.
Total Floorspace	14,885 sq.m.	17,441 sq.m.

Case history

13 On 31 October 2018, a pre-application meeting was held with GLA officers regarding the above proposal (GLA/4868). Whilst the applicant requested that no formal response be provided by GLA officers, at the meeting officers raised concerns with regard to the following strategic issues; strategic views, heritage, design quality, public accessibility, transport and public realm.

Strategic planning issues and relevant policies and guidance

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan 2015 and the London Plan 2016 (consolidated with alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan (December 2017) and the Minor Suggested Changes to the draft London Plan (August 2018), which should be taken into account on the basis explained in the NPPF.
- Draft City of London Local Plan (November 2018), which should be taken into account on the basis explained in the NPPF.

16 The relevant issues and corresponding policies and guidance are as follows:

- Central Activities Zone *London Plan; Central Activities Zone SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Tall Buildings *London plan; London View Management Framework SPG;*
- Heritage *London Plan; Character and Context SPG; London View Management Framework SPG; London World Heritage Sites SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy, Crossrail SPG.*

Principle of development

Visitor attraction

17 The London Plan and Draft London Plan seek to reinforce the position of the London as a world-leading destination for tourists. Whilst there is no specific policy relating to the provision of new visitor attractions, London Plan Policy 4.5 states that decision makers should “support London’s visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision”.

18 Policy E10 of the draft London Plan seeks to strengthen London’s visitor economy by enhancing and extending its attractions, inclusive access, legibility and visitor experience. With specific regard to the CAZ, draft London Plan Policy SD4 states that the attractiveness of CAZ locations should be enhanced to residents, businesses and visitors.

19 While the London Plan and draft London Plan primarily seek to promote the strategic function of the City of London as a nationally important location for globally-oriented financial and business services, the provision of a visitor attraction in this location would be complementary to this function and would accord with the wider policy aspirations for the CAZ.

Loss of 20 Bury Street

20 The existing building at 20 Bury Street was granted planning permission in August 2000 as part of the original application for 30 St Mary Axe and serves as building management and back of house support for 30 St Mary Axe. The demolition of this building would result in the loss of 428 sq.m. of office space, 352 sq.m. of retail and approximately 3,899 sq.m. of back of house and plant space.

21 Policy 2.10 of the London Plan and Policy SD5 of the draft London Plan require that mixed-use developments within the CAZ do not result in a net loss of office floorspace. Given

the proposals would not re-provide office floorspace, the resulting loss of this space would be contrary to the London Plan and draft London Plan. It is however accepted that the loss would be relatively minor in nature and could potentially be offset were the proposals to result in significant enhancements to the functioning of the CAZ, along with wider public benefits.

Public access

22 London Plan Policy 7.7 and Policy D8 of the draft London Plan require free to enter publicly accessible areas to be incorporated into tall buildings, particularly those that are more prominent such as the proposed development. Whilst there would be some limited space for free use by schools (88 sq.m. classroom and a further 102 sq.m. of ancillary space), the remainder of the floorspace on the upper 12 levels of the proposal would be accessible only to those paying an entrance fee (2,353 sq.m.), or making use of the restaurant/bar (1,034 sq.m.) on a booked basis.

23 In order to accord with the above policies, the proposals should include free to enter publicly accessible viewing spaces. Furthermore, any publicly accessible viewing spaces should provide a 360 panoramic view of the surrounds, and in this regard it is noted that the proposed educational space would suffer from constrained viewing angles owing to ancillary functions also located on the same level.

24 Furthermore, and in line with London Plan, draft London Plan and City of London policies, there is an increasing amount of free to enter viewing gallery space within the City of London, and in the Eastern Cluster in particular. Recently approved applications within the Eastern Cluster at 1 Undershaft and 100 Leadenhall, contain 1,800 sq.m. and 829 sq.m. of free to enter viewing gallery space respectively, with that at 1 Undershaft also including an education centre. Given that these viewing galleries are free to enter publicly accessible spaces offering views from similar vantage points to that proposed, it is difficult to ascertain the benefit of a paid for viewing gallery in this location.

Urban design

25 The design principles in chapter seven of the London Plan and chapter 3 of the draft London Plan place expectations on all developments to achieve a high standard of design which responds to local character, enhances the public realm and includes architecture of the highest quality that defines the area and makes a positive contribution to the streetscape and cityscape.

Tall building and architectural quality

26 As discussed above the site is located within the Eastern Cluster of tall buildings in the City of London. Notwithstanding the heritage considerations detailed in paragraphs 39 to 63 below, this is a location where the principle of tall buildings is generally accepted, subject to the highest standards of architecture and urban design as set out in London Plan Policies 7.7 and Policy D8 of the draft London Plan.

27 The proposed building would rise to 305.3 metres AOD and, at approximately 0.35m higher than 1 Undershaft, would be the tallest building within the Eastern Cluster. The rationale for this significant height appears unjustified and unrelated to the context of the emerging form of the cluster. This lack of justification is particularly acute given that the building supports a very limited amount of functional floorspace and fails to provide free to enter public viewing spaces as noted above.

28 Furthermore, the highly distinctive design approach steps away from the predominantly faceted form of the surrounding cluster. The vast majority of this height, approximately 255 metres, would constitute a concrete shaft or 'stem' which rises from ground level up to the base

of the domed, bulb structure. The introduction of significant expanse of solid and inactive building frontage - with only the very upper parts being animated by glazed projecting oval sections and the proposed 'gondola' features - would appear incongruous in the existing crystalline context of the cluster and would draw significant attention to the buildings form and presence. In line with the heritage concerns outlined below, this design approach is questioned.

29 The submitted townscape assessment also demonstrates that the proposed massing and form would represent a departure from the shaping of the cluster from multiple long and short range views. A new high point to the cluster, sitting at its eastern extremity, would likely lead to the further eastward spread of the cluster, thereby resulting in potential conflict with a number of highly sensitive heritage views. Further discussion of the impacts of the proposals on strategic views and the historic environment are set out in the respective sections below.

Layout and public realm

30 The application site, which as noted above extends around much of the base of 30 St Mary Axe, equates to 2,900 sq.m. or 0.29 hectares. The existing building at 20 Bury Street occupies a floor area of approximately 225 sq.m. and, notwithstanding the servicing ramp, is the only area of built structure within the application site. The footprints of the two separate buildings - the tower building and the entrance building - would occupy approximately 1,000 sq.m. and would therefore result in a significant erosion of the open, non-built upon area within the site.

31 The area of public realm surrounding 30 St Mary Axe is understood to have been provided as a justification for the height of the building in relation to its context at time of construction. This public realm now plays an important amenity role within the wider cityscape offering relief and circulation space for pedestrians, workers and visitors from the dense urban form of the City of London. The public realm is also well used and has become home to a weekly street food market as well as catering for outdoor events and acting as an outdoor seating area for the restaurant/bar at the base of 30 St Mary Axe.

32 It is noted that the proposals offer a degree of mitigation for this loss of public realm through the notional public space at roof level of the two-storey entrance building, however, access to this space would be overseen by the applicant via an internal lift within the entrance building, and as such any sense of public ownership of this space would be negligible.

33 New landscaping, also suggested to mitigate for the reduction in quantum of public realm, is proposed in the form of a 137 sq.m. pocket park located at north of the site between the tower building and the entrance building. Whilst it is noted that the pocket park, along with the roof garden, would increase the quantum of green space across the site, the introduction of a water feature and new semi-mature trees - understood to act as a buffer preventing adverse wind conditions - would act to further clutter and crowd the remaining public realm.

34 The application documentation states that the proposals would result in increased pedestrian permeability through the site as a result of the removal of the existing 'boundary walls'. However, these 'boundary walls' also serve as well-used informal seating areas and complement the existing attractive public realm offer. Further discussion of the impacts on pedestrian flows is detailed in paragraphs 67-74 below.

35 Having regard to the above, the reduction in quantum of public realm arising from the proposals would be detrimental to the pedestrian and visitor experience in this part of the Eastern Cluster of the City of London. In addition, the remaining areas of public realm would suffer from an increased sense of enclosure resulting from the introduction proposed development. The net effect of the development would therefore be smaller, less appealing

areas of public realm and the proposals would be contrary to Policy 7.5 of the London Plan and Policy D1 of the draft London Plan.

Strategic Views

36 The site is not over sailed by any strategic viewing corridors, however, given the scale of the proposal, the building would be visible in various strategic view panoramas and river prospects as defined by the London view Management Framework (LVMF) SPG. As part of the environmental assessment which accompanies the scheme, the applicant has presented a wide range of verified view studies (including visualisations of the proposal from LVMF views 1A.1 & 2; 2A.1; 3A.1; 4A.1; 5A.2; 6A.1; 10A.1; 11B.1 & 2; 15B.1 & 2; 16B.1 & 2; 17B.1 & 2; 19A.1; 25A.1 & 2 & 3; and 26A.1).

LVMF panoramas

37 The proposals are shown to impact on a number of LVMF London Panoramas. These include Alexandra Palace, assessment points 1A.1 and 2; Parliament Hill 2A.1; Kenwood 3A.1, Primrose Hill 4A.1; Greenwich Park 5A.2; and Blackheath 6A.1. In each of these Panoramas, the proposed building would be clearly visible on the skyline and would appear as a distinctive element, due to its unique form and silhouette. From these distant viewing points, the proposed building would appear alongside other existing and consented buildings and would be perceived as part of an established grouping of tall buildings within the City of London's Eastern Cluster. As such, the proposed building would preserve the ability to appreciate the various strategic landmarks identified by the LVMF SPG for above mentioned views.

LVMF river prospects

38 The proposals are shown in the context of a number of LVMF River Prospects. These include Tower Bridge upstream 10A.1; London Bridge downstream 11B.1 and 2; Waterloo Bridge downstream 15B.1 and 2; Southbank at Gabriel's Wharf 16B.1; Golden Jubilee/Hungerford Footbridges downstream 17B.1 and 2; Lambeth Bridge downstream 19A.1 and Queen's Walk 25A.1, 2 and 3. In the majority of these views, the proposed building would be screened behind, or would sit centrally within, the cluster of existing and consented buildings within the City of London. The images illustrate that the proposed building would be highly visible in views 10A.1, 25A 1, 2 and 3, and would appear in the context and setting of the Tower of London WHS, as discussed in further detail below.

Historic Environment

39 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*" and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*".

40 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits

that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

41 London Plan Policy 7.7 and Policy D8 of the Draft London Plan state that tall buildings, such as the proposal, should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternative have been explored and there are clear public benefits that outweigh that harm.

42 With respect to heritage assets, London Plan Policy 7.8 and Policy HC1 of the draft London Plan require that developments affecting the setting of heritage assets - including conservation areas, listed buildings, scheduled monuments and WHS - should conserve their significance. Additionally, London Plan Policy 7.10 and Policy HC2 of the draft London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value (OUV), integrity, authenticity or significance.

43 With respect to strategic views, London Plan Policies 7.11 and 7.12 and Policies HC3 and HC4 of the draft London Plan identify strategically important views of the Tower of London WHS and state that development should not harm and seek to make a positive contribution to the characteristics, composition and landmark elements of these views.

44 The submitted Townscape and Visual and Built Heritage Assessment (TVBHA) considers the impact of the proposal on the WHS and its OUV, as well as a number of other designated heritage assets in close proximity to the application site. This document is considered to assess an appropriate range of views of the Tower of London WHS and nearby heritage assets. However, a number of findings within the document, particularly with respect to the impact on views and the setting of the WHS are questioned, as discussed further below.

45 Whilst the verified views within the TVBHA demonstrate that the proposal may be seen in the wider setting of a number of WHS (including Maritime Greenwich), its impact is most significant on the Tower of London WHS which is situated approximately 0.6km to the south-east of the application site. The Tower of London is one of London's four WHS, and its history, development and significance are widely recognised and form the basis of the site's OUV. This OUV is derived from several attributes which include but are not limited to; the site's status as an internationally famous monument; the site's strategic and landmark siting; the site's role as a symbol of Norman Power, the physical dominance of the 11th century Norman White Tower at of centre of the site; the concentric defences around the site; the surviving 11th to 16th century ruins at the site and their symbolism of royal power; and the site's historical association with the institutions of the state. The Tower of London is also a Scheduled Monument, contains a number of listed buildings and is within a conservation area.

46 The submitted views study within the TVBHA provides the basis for considering the impacts proposed. Important views looking towards and across the Tower of London from the south side of the River (LVMF 25A.1, 25A.2 and 25A.3) and Tower Bridge (10A.1) as well as views from within the Tower of London have been assessed.

LVMF View 10A.1

47 This view looks upstream and originates from the North Bastion of Tower Bridge, a Grade I listed building of national significance. The elevated view enables the fine detail and layers of history of the Tower of London WHS to be readily understood. The significance of this

viewing place is also highlighted within the World Heritage Site Management Plan Setting Study as being one of the best places from which to view the WHS.

48 From this viewing location, the White Tower is clearly visible at the heart of the WHS and retains its landmark value and high level of visual dominance on the skyline for the following reasons: The Tower of London is located in the foreground of the view and is in close proximity to the viewer, allowing the detail of the building to be clearly visible; the White Tower appears as a stand-alone element due to the retention of clear sky behind its distinctive corner towers and retention of a clear gap between its west elevation and the cluster of existing and consented taller buildings within the City of London and; the solid stone elevations of the Tower of London contrast significantly with the emerging glazed and faceted form of the modern buildings within the emerging City of London cluster.

49 The applicant's TVBHA acknowledges this LVMF River Prospect as being of 'high' to 'exceptional' townscape quality with a 'generally high sensitivity to change because views of the surroundings are an important contributor to the setting of this designated strategic viewpoint'. This is considered to be an accurate representation of the significance of this view.

Impact of proposals on View 10A.1

50 The proposed building would appear to the right-hand side of 30 St. Mary Axe, rising marginally higher than the tallest consented building in the Eastern Cluster, 1 Undershaft. Whilst the neighbouring existing and consented tall buildings within the City cluster appear to form shoulders rising up to the height of 1 Undershaft, the proposed building would stand separate from the cluster at the upper levels, being surrounded by clear sky for over half of its apparent height. The majority of the proposed building would appear as a solid construction with only the very upper parts being animated by glazed projecting oval sections and the proposed 'gondola' features.

51 In relation to the setting of the Tower of London WHS in this view, the proposed building would appear to be located very close to the Tower and would be seen to encroach upon the clear sky gap between the White Tower and the City cluster, particularly at the upper levels. For much of its height, it would appear to be a vertical solid shaft that would be seen to abruptly terminate the eastern side of the City cluster. Its solid and highly distinctive form would be in direct contrast to the emerging form of the City cluster and to the architecture of the Tower of London, thereby making it a new focal point and landmark in this view. This would serve to challenge the dominance of the Tower of London as a key feature in the view.

52 It is noted that the applicants (TVBHA) states that 'due to the exceptional townscape quality and very high sensitivity to change of the view of the White Tower and the proximity of the proposed development to this element of the view, the major magnitude of change to the composition of the view would result in a very major scale of effect, the qualitative nature of which, would be adverse'. GLA officers concur with this opinion and conclude that the proposals are contrary to the Visual Management Guidance for View 10A.1 of the LVMF and cause a high degree of harm to the setting of the Tower of London WHS in this view.

LVMF Views 25A 1, 2 and 3

53 This kinetic set of views encompasses a series of viewing locations on the south bank of the Thames close to the two public open spaces on either side of City Hall. These locations provide good views of the Tower of London with a relatively clear background setting to the White Tower. The WHS Management Plan Setting Study notes that views from these locations 'exemplify many of the cultural qualities that give the Tower its OUV, including its landmark siting on the River Thames, its role as a symbol of Norman Power, as an outstanding survival of

Norman keep architecture in England, as a model example of a medieval fortress palace, and its associations with State institutions.

54 The juxtaposition of the WHS with the modern city is noted as being a central characteristic in these views and there are a rich variety of landmark elements. It is noted that the White Tower still appears as a large and dominant feature on the skyline and these views provide the best places from which to see the Tower of London in its riverside context and to understand the complex historic relationship between the Tower and the City of London, which still exists today as illustrated through the challenges for dominance in these views. Whilst other heritage assets feature within these views, the Tower of London WHS is very much the key landmark feature.

55 The applicant's TVBHA acknowledges this LVMF River Prospect as being of 'high' to 'exceptional' townscape quality with a generally high sensitivity to change. This assessment is considered to be accurate.

Impact of proposals on View 25A 1, 2 and 3

56 The proposed building would appear to the right-hand side of 30 St. Mary Axe and other consented buildings in the emerging City cluster notably 100 Leadenhall Street and 22 Bishopsgate. From these viewing locations, the consented buildings on the eastern side of the cluster appear to rise steeply. The proposed building would rise to a height comparable with 1 Undershaft, located at the centre of the cluster. The proposed building would stand separate from the existing cluster in the most easterly view (view 3) and would gradually move alongside the consented buildings at 100 Leadenhall Street and 22 Bishopsgate as the viewer moves west (views 1 and 2).

57 As with view 10A.1, the majority of the proposed building would appear as a solid construction with only the very upper parts being animated by glazed projecting oval sections and the proposed 'gondola' features.

58 In relation to the setting of the Tower of London WHS in this view, the proposed building would appear to have a close relationship to the City cluster and to retain a clear sky gap between the City and the Tower of London.

59 The building would appear to contrast in form, materials and design from the emerging buildings within the City cluster, which are largely glazed and faceted in form. It would rise steeply on the eastern side of the cluster and would have clear landmark value in relation to its distinctive architectural form and materials. As such, it would become a focal point within these views and would compete for visual dominance with the Tower of London. As such, the proposals are considered to cause harm to the setting of the Tower of London WHS and to be contrary to the Visual Management Guidance in the LVMF, which states that 'new development should respect the setting of the Tower of London and should not dominate the World Heritage Site'. GLA officers therefore concur with the applicant's assessment that the impact of the proposals is 'major', but do not concur that this change is 'beneficial' and consider that the proposals cause harm to the setting of the Tower of London WHS through their visual dominance.

Views within the Tower of London

60 Further impacts on the setting of the Tower of London would be experienced from views towards the application site from within the Tower, which are also assessed within the Townscape and Visual and Built Heritage Assessment. The proposal would be visible in views 26, 29, 30 and 31 within the assessment. Most notable is the impact on view 26 from Inner Ward

towards the Chapel Royal of St. Peter ad Vincula. In this view, the top of proposed development would be visible above the roofline of the Chapel building. The consented buildings at 22 Bishopsgate and 1 Undershaft would also intrude into this view when complete, however, the distinctive form of the proposal would draw increased attention and result in impacts on this view, particularly in the winter scenario. GLA officers concur with the applicant's assessment that the impact of the proposals is 'major', but do not concur that this change is 'neutral'.

Other heritage sensitive impacts

61 As mentioned in paragraph 7 (and assessed within the submitted TVBHA), there are numerous heritage assets in the immediate vicinity of the site (including St Helen's Place and Bishopsgate Conservation Areas, the Grade II listed No. 38 St Mary Axe, the Grade II* listed Holland House, Grade I listed Bevis Marks Synagogue, and Grade I listed St Botolph's Church Aldgate) as well as various others which the proposal would be seen in conjunction with in longer townscape and strategic views including the Grade I Listed St Paul's Cathedral.

62 With respect to St Botolph's Church, the proposals would be visible in key views of the southern elevation of the church looking along Aldgate High Street. The Grade I listed church dates from 1744 and was designed by renowned architect Dance the Elder. As illustrated in View 54 of the TVBHA, the church addresses the street with a fine symmetrically composed facade and distinctive central tower with a spire over. This view is considered to be of high significance in relation to the setting of the church, because it is one of the few places from which the tower and spire of the church can be seen to stand proud of backdrop development. The proposed building would appear directly to the left-hand side of the tower and spire in this view and would form a contrasting and dominant element that would be seen to challenge the dominance of the church tower. As such, the proposals are considered to cause a degree of harm to the setting of the Grade I listed church.

63 With regard to the assessment of the remaining heritage assets listed in paragraph 58, and having special regard to the desirability of preserving the setting of Listed Buildings and the character or setting of conservation areas, GLA officers are of the view that the proposal would not harm the setting of these Listed Buildings and would also not harm the character/setting of the conservation areas owing to the level of cumulative development, largely from the existing Eastern Cluster, within the settings of these designated heritage assets.

Assessment of harm

64 Having special regard to the desirability of preserving the setting of listed buildings and preserving the character and setting of conservation areas, as set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, and in light of the harm resulting from the proposed tall building to the setting of heritage assets, including the WHS and its OUV, and the harm to strategic LVMF views, the proposals are contrary to London Plan Policies 7.7, 7.8, 7.10, 7.11 and 7.12 and Policies D8, HC1, HC2, HC3 and HC4 of the draft London Plan.

65 With specific regard to the impact of the proposals on the setting of the Tower of London WHS, as illustrated in LVMF views 10A.1 and 25A.1, 2 and 3, GLA officers conclude that the proposals would result in a significant level of harm of to the significance of the Tower of London WHS. Whilst this level of harm is considered to be less than substantial in NPPF terms, given the major adverse impacts to LVMF views and the setting of the WHS, the degree of harm would be at the upper limits of less than substantial harm. The proposals would also diminish the ability to appreciate the OUV of the Tower of London WHS. As illustrated in LVMF views 10A.1 and 25A.1, 2 and 3, the height, design and materiality of proposals, along with the proximity of the application site to the Tower of London WHS, are considered to adversely affect the

following attributes of the OUV; the physical prominence of the White Tower and; the site's strategic and landmark setting.

66 Additionally, the prominence of the proposal within views of the central tower and spire of the Grade I listed St Botolph's Church and the resulting harm on the setting of this designated heritage asset, is considered to result in less than substantial harm to the significance of the Grade I listed building.

67 Paragraph 193 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Given that the harm relates to a WHS, a heritage asset of the highest significance, the weight applied to its conservation, and any harm to its significance, should be very high. Paragraph 196 of the NPPF 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...*".

68 Having regard to the characteristics of this scheme, and the application submission documents, GLA officers are of the view that the tangible public benefits of this scheme are minimal and amount to the approximately 88 sq.m. of educational space (plus 102 sq.m. ancillary space). Further to this, the relative public disbenefits of the proposal, in terms of the adverse impacts on public realm and pedestrian movement should also be considered. In the context of less than substantial harm to a WHS - a heritage asset of the highest significance - the negligible level of public benefit falls substantially short of anything appropriate and the proposals would therefore fail to accord with the provisions of the NPPF.

Inclusive design

69 The scheme represents an important opportunity to promote equal and convenient access to employment opportunities in accordance with the principles of London Plan Policy 4.12 and Policy GG5 of the draft London Plan and should achieve the highest standards of accessible and inclusive design in accordance with London Plan Policy 7.2 and Policies D3 and E11 of the draft London Plan. Based on the submitted information the proposals provide the key features for compliant and convenient access and are therefore capable of achieving the high standards for inclusive access to meet the needs of the public in accordance with the London Plan and draft London Plan.

Climate change

Energy

70 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. In addition, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels and Heat Pumps. The approach proposed would achieve a 42% carbon dioxide reduction which exceeds London Plan and draft London Plan standards.

71 As the development is located close to the City 2 proposed district heating network, the applicant must demonstrate that the opportunity to connect to this network has been fully investigated by providing evidence of communication with the network operator to establish the

anticipated timeframes of the network and its available capacity for connection. The full BRUKL files for each stage of the energy hierarchy should also be submitted for review. This information must be submitted before the proposals can be considered acceptable and the carbon dioxide savings verified.

Transport

72 The submitted application documentation projects that the visitor attraction is likely to attract 1.2 million visitors per year. On this basis, the proposals would have significant impacts on pedestrian movements within the Eastern Cluster, an area noted to suffer from extremely high levels of pedestrian crowding. This crowding is likely to intensify in the near future due to the opening of Crossrail at Liverpool St Station and with the completion of multiple high density new developments including those referred to in paragraph 7 above.

73 Furthermore, and as set out in paragraph 30 above, the open, accessible space on the site will significantly decrease through the introduction of two separate buildings in an area that currently offers important public realm and pedestrian routes within this part of the City of London.

74 The application is supported by a Transport Assessment and separate Pedestrian Movement Analysis. Given the high PTAL rating, with the proximity of a number of London Underground, rail and bus services, the increased demand arising from these proposals will not require any site-specific mitigation. Nevertheless, there are significant concerns relating to the impacts on pedestrians and cyclists arising from the proposals.

75 It is noted that the submitted Pedestrian Movement Analysis uses 2015 baseline flows which are considered too low as they fail to take into account changes to pedestrian flows within the last 3 years. Contemporary empirical surveys should be undertaken so as to provide an accurate baseline from which to generate forecasts. Further to this, the forecast model creates a 2025 scenario based on a range of unjustified adjustment factors including those for transport growth and population growth, whilst the visitor distribution figure is based on visitor behaviour from 30 St Mary Axe, a predominantly B1 office building, and unlikely to be comparable in nature.

76 Any new pedestrian movement forecasts should be based on empirically surveyed baseline flows, projected growth due to the proposed development, and 25.6% and 18.75% increases in background growth for 2044 and 2030 respectively. Those expected increases have been estimated and endorsed by the City of London in their draft Transport Strategy.

77 No new cycle parking is proposed which would not comply with the London Plan or draft London Plan. In order to accord with Policy T5 of the draft London Plan, 126 new short-stay cycle parking spaces would be required. Furthermore, the application proposes to convert 114 existing long-stay cycle parking spaces for users of 30 St Mary Axe to make them non-compliant with the London Cycle Design Standards (LCDS). The proposals would therefore retrospectively alter an existing building to reduce the quality of its active travel offer.

78 On the basis of the submitted information, and without the further clarifications and justifications noted above, the design of the proposals is considered to result in a poor quality, unwelcoming, unnecessarily confined and potentially unsafe pedestrian environment. The proposals would therefore fail to comply with Policy 6.10 of the London Plan and Policy D1 of the draft London Plan, which requires the form and layout of a place to encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area.

79 Additionally, the proposals would not reflect the Healthy Streets approach detailed and required by Policies T2 and T4 of the draft London Plan. The proposal would also not accord with draft London Plan Policy T3 as the reduction in public realm and pedestrian routes would fail to safeguard existing land and buildings used for transport or support functions and no alternative facilities are provided.

80 The proposed development would be located in the Crossrail, Central London charging area and include chargeable floorspace, potentially including the sui generis, viewing gallery element. A Crossrail contribution would therefore need to be secured in any future section 106 agreement.

Local planning authority's position

81 Planning officers at the City of London have been involved in extensive pre-application discussions on the scheme however a date has not been set for the City of London to formally consider the application at a planning committee meeting.

Legal considerations

82 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

83 There are no financial considerations at this stage.

Conclusion

84 London Plan and draft London Plan policies on central activities zone; employment; urban design; heritage; inclusive design; transport; and climate change are relevant to this application. The application does not comply with the London Plan and draft London Plan for the following reasons:

- **Principle of development:** The principle of a visitor attraction within a CAZ location would complement the strategic functions of the CAZ. However, the proposal fails to provide free to enter publicly accessible viewing areas and is therefore contrary to London Plan Policy 7.7 and Policy D8 of the draft London Plan.
- **Historic Environment:** The development would compromise the ability to appreciate the Outstanding Universal Value of the Tower of London World Heritage Site and would cause harm to the historic environment. Accordingly, the application does not comply with London Plan policies 7.7, 7.8, 7.10, 7.11 and 7.12 and Policies D8, HC1, HC2, HC3 and HC4 of the draft London Plan.

- **Design:** GLA officers have significant concerns with the design approach. The height is unjustified and the design and the introduction of significant expanse of solid and inactive building frontage would appear incongruous in the existing faceted context of the Eastern Cluster drawing significant attention in this heritage sensitive location. The site layout and loss of public realm at street level is also of significant concern
- **Strategic Views:** The appearance of the proposed development within LVMF views 10A.1 and 25A 1,2 and 3 would cause harm to these strategic views and would therefore be contrary London Plan Policies 7.11 and 7.12 and Policies HC3 and HC4 of the draft London Plan.
- **Transport:** The proposals are considered to result in a poor quality, unwelcoming, unnecessarily confined pedestrian environment contrary to Policy 6.10 of the London Plan and Policy to D1 of the draft London Plan. The proposals would not reflect the Healthy Streets approach detailed within Policies T2 and T4 of the draft London Plan. The level of cycle parking would not accord with draft London Plan Policy T5.
- **Energy:** The applicant must explore the potential for connection to the City 2 district heat network. The full 'be lean' and 'be green' BRUKL sheets must be submitted. This further information must be submitted before the proposals can be considered acceptable and the carbon dioxide savings verified.

for further information, contact GLA Planning Unit (Development & Projects Team):

Julietta McLoughlin, Chief Planner

020 7983 4271 email julietta.mcloughlin@london.gov.uk

John Finlayson, Head of Development Management

020 7084 2632 email john.finlayson@london.gov.uk

Katherine Wood, Team Leader

020 7983 5743 email Katherine.wood@london.gov.uk

Simon Westmorland, Case Officer

020 7084 2741 email simon.westmorland@london.gov.uk



Bhakti Depala
City of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Place Directorate
Development Management
Town Hall, Mulberry Place
5 Clove Crescent
London
E14 2BG
www.towerhamlets.gov.uk

Application Number: PA/18/03314
Your ref: 18/01213/FULEIA

Enquiries to: Daria Halip
Tel: 0207 364 5203
Email: Daria.Halip@towerhamlets.gov.uk

8 February, 2019

Dear Bhakti Depala,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

**Location
Proposal**

Land Adjacent To 20 Bury Street London EC3A 5AX
Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597sq.m GEA], an education facility [567sq.m GEA] (Sui Generis) and restaurant/bar use (Class A3/A4) [1,535sq.m GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093sq.m GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1/A3) [11sq.m GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm. [Total Scheme Area: 17,441sq.m GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application.

The London Borough of Tower Hamlets **RAISES OBJECTIONS** to the above referenced application on the following grounds:-

1. Design and heritage: the proposed development would cause serious unacceptable (less than substantial) harm to the significance and setting of the Grade I listed Tower of London World Heritage, without significant and proportionate public benefit to justify such harm. The proposed development would conflict with paragraph 193 and 196 of the NPPF and policies 7.7, 7.8, 7.10, 7.11 and 7.12 of the London Plan, including policies D8, HC1, HC2, HC3 and HC4 of the draft London Plan.

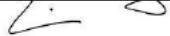
2. Transport: the proposal is likely to impact onto the LBTH local public transport infrastructure which would have to absorb a proportion of the forecasted visitors to site annually. Insufficient information has been submitted with the application to allow officers to fully understand the likely impacts on to the transport network. LBTH reserve the right to provide comments when such information is made available.

3. Environment: the Environmental Statement does not contain sufficient information to fully assess the proposals and there is likely to significant adverse affects in terms of greenhouse gas emissions

The full details of the London Borough of Tower Hamlets objection is contained in **Appendix A - 'Strategic Development Committee Report dated 05.02.2019'**

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Owen Whalley, Divisional Director - Planning and Building Control

From: Jack Berends
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 18/01213/FULEIA
Date: 22 November 2018 11:26:16

Hi Bhakti Depala,

Thank you for consulting London City Airport RE the 305.3m AOD Tulip Building on Bury Street - reference: 18/01213/FULEIA. The proposed development has been examined from an aerodrome safeguarding perspective based on the information provided. London City Airport has no direct safeguarding objection to the completed structure.

London City Airport requests to see the following conditions added to this application:

1. 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.
2. Construction shall not commence until an assessment has been carried out on the impact of this development on the RADAR coverage. During this assessment it should be noted that the gondolas present will be moving and therefore may have a slightly different effect than a static element of the building. This needs to be authorised by the Local Planning Authority having consulted with London City Airport and NATS En Route Limited.
3. No part of this development shall be constructed before the completed building and its construction methodologies are assessed against LCY's instrument flight procedures (IFPs) by a CAA approved procedure designer.
4. No part of the proposed development or associated construction activities shall commence until LCY is satisfied that there will be no reduction of the integrity of the current Instrument Landing System (ILS) in use at London City Airport.
5. No Building or structure to permanently form part of the Development shall exceed London City Airport's Obstacle Limitation Surfaces (OLS) dated August 2004.
6. No temporary infringements of the London City Airport protected surfaces (305.3m AOD) shall occur while LCY is open or closed unless explicitly authorised by London City Airport Limited.

Kind regards,

Jack Berends
Technical Operations Coordinator

Phone: 020 3203 2523

Mobile: [REDACTED]

Email: [REDACTED]

Website: www.londoncityairport.com

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk [mailto:PLNComments@cityoflondon.gov.uk]

Sent: 19 November 2018 11:00

To: Safeguarding

Subject: Planning Application Consultation: 18/01213/FULEIA

Dear Sir/Madam

Please see attached consultation for Land Adjacent To 20 Bury Street London EC3A 5AX .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala

Department of the Built Environment

City of London

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London City Airport Limited: registered in England and Wales number 01963361.

Registered office: City Aviation House, Royal Docks, London, E16 2PB. VAT Registration: 740 1688 41.

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From: Jack Berends
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: RE: Planning Application Consultation: 18/01213/FULEIA
Date: 13 March 2019 12:40:38

Dear Bhakti Depala,

I am writing to you to confirm that London City Airport is now able to withdraw conditions 2 and 4 from the below list.

Kind regards,

Jack Berends
Technical Operations Coordinator

Phone: [REDACTED]
[REDACTED]

Email: [REDACTED]

Website: www.londoncityairport.com

From: Jack Berends
Sent: 22 November 2018 11:26
To: PLNComments@cityoflondon.gov.uk
Subject: RE: Planning Application Consultation: 18/01213/FULEIA

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by a CAA approved procedure designer.

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Kind regards,

Jack Berends
Technical Operations Coordinator

Phone: [REDACTED]

Mobile: 0 [REDACTED]

Email: [REDACTED]
[REDACTED]

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk [<mailto:PLNComments@cityoflondon.gov.uk>]

Sent: 19 November 2018 11:00

To: Safeguarding

Subject: Planning Application Consultation: 18/01213/FULEIA

Dear Sir/Madam

Please see attached consultation for Land Adjacent To 20 Bury Street London EC3A 5AX .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment
City of London

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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>

Bhakti Depala
City of London
By email

03/12/18

Dear Bhakti,

Re: Planning Application No. 18/01213/FULEIA

Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597 sqm GEA], an education facility [567 sqm GEA] (Sui Generis) and restaurant / bar use (Class A3 / A4) [1,535 sqm GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093 sqm GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1 / A3) [11 sqm GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm.[Total Scheme Area: 17,441 sqm GEA].

Location: Land Adjacent To 20 Bury Street London EC3A 5AX.

Our Ref: LHR4104

We refer to your email dated 19/11/18, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- *details of cranes and other tall construction equipment (including the details of obstacle lighting) – Such schemes shall comply with Advice Note 4 ‘Cranes and Other Construction Issues’(available at www.aoa.org.uk/policy-campaigns/operations-safety).*

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not contravene the regulation set out in the London Tall Buildings Policy, and endanger aircraft movements and the safe operation of Heathrow Airport.

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 Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

From: Helena Payne
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: 18/01213/FULEIA - Land Adj to 20 Bury Street (PLA Ref DC 831)
Date: 04 December 2018 08:57:38
Attachments: [image002.png](#)
[image003.png](#)

FAO: Bhakti Depala

Dear Bhakti

Thank you for consulting the Port of London Authority on the above-mentioned planning application. The location of the site in proximity to the River and scale of the proposed development is such that there is unlikely to be any bearing on the interests of the PLA in this instance. As a result, the PLA has no comment to make on the applications.

Kind Regards

Helena

Helena Payne
Senior Planner
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562385
WWW.PLA.CO.UK



Find out about the Cleaner Thames campaign:

- Website: www.pla.co.uk/Cleaner-Thames
- Film: <https://youtu.be/9bsLmgzPHQE>
- Twitter: @LondonPortAuth #cleanerthames



Almost half of all incidents on the tidal Thames are caused by **Human factors**. Maintain a positive **Safety Culture** by:

- Ensuring good communications
- Following best practice
- Not being distracted

PLA Find out more at www.pla.co.uk/humanfactors/

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website: www.pla.co.uk

SOUTHWARK COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)



www.southwark.gov.uk

FORMAL COMMENTS TO ADJOINING BOROUGH

Applicant City of London

LBS Registered Number 18/OB/0260

Date of Issue of this decision 03/12/2018

With reference to your consultation on the following development:

Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597 sqm GEA], an education facility [567 sqm GEA] (Sui Generis) and restaurant / bar use (Class A3 / A4) [1,535 sqm GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093 sqm GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1 / A3) [11 sqm GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm.[Total Scheme Area: 17,441 sqm GEA].

This application is accompanied by an Environmental Statement. A CD copy of the Environmental Statement may also be obtained from Peter Twemlow , DP9, 100 Pall Mall,

At: LAND ADJACENT TO 20 BURY STREET, LONDON EC3A 5AX

In accordance with your letter received on 19/11/2018 Your Ref. No.: 18/01213/FULEIA

NO COMMENT FROM LBS ON THIS APPLICATION

Signed *Simon Bevan*

Director of Planning

Your attention is drawn to the notes accompanying this document

Any enquiries regarding this document should quote the LBS Registered Number and be sent to the Director of Planning, Southwark Council, Chief executive's department, Planning division, Development management, PO Box 64529, London SE1 5LX, or by email to planning.applications@southwark.gov.uk

UPRN:

TP/2018/OBS/COL

--

Date: 01 December 2018
Our ref: 265145
Your ref: 18/01213/FULEIA



Bhakti Depala
City of London
Guildhall
PO Box 270
London
EC2P 2EJ

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

PLNComments@cityoflondon.gov.uk

Dear Sir/Madam

Planning consultation: Demolition of existing building and structures and construction of a building to a height of 305.3m AOD for a mixed-use visitor attraction, including viewing areas [2,597 sqm GEA], an education facility [567 sqm GEA] (Sui Generis) and restaurant / bar use (Class A3 / A4)[1,535 sqm GEA]; together with a retail unit at ground floor (Class A1); a new two-storey pavilion building [1,093 sqm GEA] (Sui Generis) comprising the principal visitor attraction entrance with retail at ground floor level (Class A1 / A3) [11 sqm GEA] and a public roof garden; provision of ancillary cycle parking, servicing and plant and alterations to the public realm.[Total Scheme Area: 17,441 sqm GEA].

Location: Land Adjacent To 20 Bury Street London EC3A 5AX

Thank you for your consultation on the above dated 19 November 2018 which was received by Natural England on 19 November 2018

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 sites

Natural England's advice on other natural environment issues is set out below.

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

Gustav Moberg
Consultations Team

ANNEX A

Natural England offers the following additional advice:

Landscape

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England's [Technical Information Note 049](#).

Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraph 113 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 9, 109 and 152 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 118 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you may wish to consider off site measures, including sites for biodiversity offsetting. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraph 75 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

London Borough of Hackney
Planning and Regulatory Services
2 Hillman Street
London E8 1FB
www.hackney.gov.uk
Hackney Reference: 2018/4234

City of London
PO Box 270
Guidhall
London
EC2P 2EJ

22/11/2018

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

Application Number: 2018/4234
Site Address: Land Adjacent To
20 Bury Street
London
EC3A 5AX

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

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours faithfully



Ian Rae
Head of Planning
Planning Service
Neighbourhoods and Housing



PLANNING DECISION NOTICE

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

Agent: City of London	Applicant: c/o Agent
PO Box 270	c/o Agent
Guidhall	
London	
EC2P 2EJ	

Part 1- Particulars of the Application **Application No:** 2018/4234
Date of Application: 08/02/2016
Date Validated: 08/02/2016
Application Type: Adjoining Borough Observations

Proposal: Notification from the City of London of an application for the demolition of an existing building and structures and construction of a building to a height of 305.3m AOD for a mixed use visitor attraction, including viewing areas, an educational facility, and restaurant/bar use, together with a retail unit at ground floor, a new two storey pavilion building comprising the principal visitor attraction entrance with retail at ground floor level and a public roof garden, provision of ancillary cycle parking, servicing, plant and alterations to the public realm.

Location: Land Adjacent To
20 Bury Street
London
EC3A 5AX

Part 2 – Particulars of Decision: **NO OBJECTIONS**

Date of Decision: 22/11/2018

Yours faithfully



Ian Rae
Head of Planning
Planning Service
Neighbourhoods and Housing

BRE Client Report

Review of daylight and sunlight, The Tulip, London EC3A 5AX

Prepared for: City of London Corporation

Date: 22 January 2019

Report Number: P114145-1000 Issue: 1

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Prepared for:
City of London Corporation
Guildhall
PO Box 270
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Prepared by

Name Dr Paul Littlefair

Position Associate Director, Lighting

Date 22 January 2019

Signature



Checked by

Name Stephanie King

Position Senior Lighting Consultant

Date 22 January 2019

Signature



This report is made on behalf of Building Research Establishment Ltd. (BRE) and may only be distributed in its entirety, without amendment, and with attribution to BRE to the extent permitted by the terms and conditions of the contract. BRE's liability in respect of this report and reliance thereupon shall be as per the terms and conditions of contract with the client and BRE shall have no liability to third parties to the extent permitted in law.



Executive Summary

A planning application (18/01020/FULMAJ), has been submitted to the City of London for a proposal to build a visitor attraction, the 'Tulip' on land adjacent to 20 Bury Street, London EC3A 5AX. The application contains an Environmental Statement. Chapter 11 'Daylight, sunlight, overshadowing, solar glare and light pollution' deals with daylight and sunlight issues. The chapter was prepared by GIA.

BRE have been commissioned by the City of London Corporation to evaluate this chapter. The evaluation was to review the scope and methodology, text and conclusions of the chapter, but not verification of the calculations. This report gives the results of the evaluation.

The Environmental Statement has analysed loss of light to all the nearby existing dwellings, and religious and educational buildings, that could be affected. Loss of daylight and sunlight to all these buildings would be within the BRE guidelines, and would be assessed as negligible.

The Environmental Statement also includes a cumulative assessment which assesses the building's impact together with other proposed buildings. Though a number of the surrounding buildings would have large cumulative losses of light, for nearly all of them this would be mainly due to the other proposed buildings in the cumulative scenario. The additional impact of the Tulip would be very small and well within the BRE guidelines. The exceptions are one window in St Helens Church, which would have already lost nearly all its light as a result of the redevelopment of 1 Undershaft; and 10-12 and 14-16 Creechurch Street. The Tulip would result in an additional relative loss of daylight marginally outside the BRE guidelines to six windows in each of these latter two buildings. This would be a minor adverse impact. The additional impact of the Tulip on sunlight to all windows would be within the BRE guidelines.

Loss of sunlight to five existing open spaces nearby has also been analysed. On March 21, the key date for assessment in the BRE guidelines, there would be no additional overshadowing of these areas. The loss of sunlight would be negligible, easily meeting the BRE guidelines.

There are no other existing open spaces at ground level for which loss of sunlight might be an issue. However the building immediately to the north of the Tulip site, 6 Bevis Marks, has roof terraces that might lose sunlight as a result of the proposed development. Loss of sunlight to these spaces could be checked.

Reflected solar disability glare to surrounding roads and railways would be negligible. This is because the glazing at the top of the Tulip is curved and would spread the reflected light over a wide area, limiting the amount of light reaching a particular location. Reflected discomfort glare from the high level glazing to surrounding commercial buildings is not expected to be significant.

The development has areas of glazing at low levels, at the base of the Tulip tower and in the proposed Pavilion building, that are concave and could potentially focus the reflected rays of the sun. The existing Gherkin (30 St Mary Axe) building means that incoming sunlight reaches these concave facades at an oblique angle, which may make a sharply focused area of reflected light less likely. Nevertheless, it is recommended that a more detailed study be carried out to establish the levels and locations of concentrated reflected sunlight.



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1 Introduction

- 1.1.1 A planning application (18/01020/FULMAJ), has been submitted to the City of London for a proposal to build a visitor attraction, the 'Tulip' on land adjacent to 20 Bury Street, London EC3A 5AX. The application contains an Environmental Statement. Chapter 11 'Daylight, sunlight, overshadowing, solar glare and light pollution' deals with daylight and sunlight issues. The chapter was prepared by GIA.
- 1.1.2 BRE have been commissioned by the City of London Corporation to evaluate this chapter. The evaluation was to review the scope and methodology, text and conclusions of the chapter, but not verification of the calculations. The evaluation was to cover daylight, sunlight, overshadowing and solar glare, but not light pollution. This report gives the results of the evaluation.
- 1.1.3 The evaluation is based on plans of the development by Foster and Partners, including site location plan 2699 A-LO-011-EX-01, proposed ground floor plan 2699 A-PT-031-00-01, proposed roof plan 2699 A-PT-031-RF-01 and proposed north-south section A-PT-053-01-01, all revision 01, and dated 13/11/18. A site visit was carried out on 11 January 2019.



2 Evaluation criteria

2.1 General approach

- 2.1.1 The Environmental Statement has evaluated loss of daylight and sunlight to existing properties using the BRE Report BR 209, Site Layout Planning for Daylight and Sunlight, a guide to good practice (ref 1). This is appropriate and widely used by local authorities to help determine planning applications.

2.2 Loss of daylight and sunlight – application of BRE guidelines

- 2.2.1 To assess the impact on the amount of diffuse daylighting entering existing buildings, the BRE Report uses the vertical sky component (VSC) on the window wall. This is one of the quantities calculated in the Environmental Statement.
- 2.2.2 The BRE Report sets out two guidelines for vertical sky component:
1. If the vertical sky component at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window.
 2. If the vertical sky component with the new development is both less than 27% and less than 0.8 times its former value, then the area lit by the window is likely to appear more gloomy, and electric lighting will be needed for more of the time.
- 2.2.3 Annex 4 of the Environmental Statement's Technical Appendix 'Daylight, sunlight, overshadowing, light pollution and solar glare' gives tables of vertical sky component 'before' and 'after' for various windows.
- 2.2.4 The BRE Report also gives guidance on the distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit. The areas receiving direct skylight will depend on room layout. Annex 4 gives daylight distribution results for all of the surrounding properties, which may be unreliable where room layouts were not available.
- 2.2.5 The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. Access to sunlight should be calculated for the main window of each of the above rooms which faces within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former value, and more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected. This guideline is also used in the Environmental Statement (Annex 4).
- 2.2.6 Guidance on sunlight in outdoor spaces is also given in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'. It gives a recommendation for outdoor spaces where sunlight is required. The Report recommends that no more than half of such an area



should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. If an existing open space does not meet this guideline with the new development in place, and the area receiving two hours of sunlight on 21 March is reduced to less than 0.8 times its former value, the loss of sunlight is significant.

2.3 Solar glare – principles

- 2.3.1 Glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users and train drivers outside and the occupants of adjoining buildings.
- 2.3.2 The occurrence and duration of potential reflection to a particular point can be predicted geometrically, for example by using the equations in BRE Information Paper IP3/87 (ref 2). This approach has been used in the Environmental Statement.
- 2.3.3 There are two types of reflected glare problem that can occur (ref 3). Discomfort glare causes visual discomfort without necessarily affecting the ability to see. Disability glare happens when a bright source of light impairs the visibility of other objects. Outdoors, disability glare is easily the more serious problem, as it can affect motorists' ability to drive safely.
- 2.3.4 The severity of glare depends on the type of glazing or cladding. The amount of glare caused depends on the specular reflectance of the glazing. This is the mirror-like direct reflection of sunlight. It is therefore possible to ameliorate reflected glare by choosing glazing with a low specular reflectance.
- 2.3.5 Glare also depends on the angle of the sun and the angle at which the building is viewed. For motorists in particular, disability glare is most likely when the reflected sun is directly in the field of view and close to their direction of vision. Glare sources off to one side, or above the observer, are less likely to cause disability glare. Usually, glare sources at more than 25 degrees to the line of sight can be discounted (ref 4).
- 2.3.6 Disability glare is likely to be especially important at locations where a driver has to make a key decision, for example approaching a road junction, traffic signal or pedestrian crossing.
- 2.3.7 In principle, disability glare can also cause problems for pedestrians, especially if they are looking along a road in preparation to cross it, and fail to see an oncoming car because of the glare of the sun in their direct line of sight. In general, though, disability glare to pedestrians is less likely to cause accidents, because they have more time to react and can more easily take avoiding action such as shielding their eyes from the reflection, or moving backwards out of the path of the reflected beam.
- 2.3.8 Discomfort glare is a less serious problem because it does not impair the ability to see. It can be important where work involves the continuous viewing of the outdoor space from a fixed vantage point, for example in military or security surveillance. Inside a building where glare could be an issue, shading devices such as blinds or curtains are generally provided, and therefore occasional discomfort glare can easily be controlled using such shading devices. In such spaces, discomfort glare due to reflected sun would be a significant issue if its occurrence was so prolonged as to affect the amenity of the space by requiring the continual additional use of blinds and curtains over long periods.
- 2.3.9 There are no specific standards setting out what constitutes an acceptable level of solar glare. It is possible to calculate disability glare and compare it with guidelines for road lighting



installations (refs 5-7). There is no specific guidance on discomfort glare from the sun, apart from recommendations on the provision of shading devices.

3 Loss of daylight and sunlight to existing dwellings

3.1 The site and surrounding areas

- 3.1.1 Figure 1, taken from the site plan by GIA, shows the new development (in a teal colour) and surrounding areas. Buildings in brown are under construction, but the Environmental Statement states that they have been taken into account in the baseline analysis. This is a reasonable approach, given that these buildings are likely to be in place once construction of the Tulip is underway.



Figure 1. Plan by GIA showing the new development (in a teal colour) and the nearest surrounding buildings. North is at the top of the plan.

- 3.1.2 Above ground, the building consists of two elements. To the east, next to St Mary Axe, is the Pavilion (reception) building, which is low rise, around 9-10m above ground level. To the west, next to Bury Street, is the Tulip itself, which is very tall, around 290m above ground level, but slender. Part of the Tulip site is currently occupied by a mid-rise (six storey) office building.
- 3.1.3 The nearest buildings are all commercial in nature. These include 30 St Mary Axe (commonly known as the Gherkin), Copenhagen House and Holland House to the east across Bury Street, 6 Bevis Marks and the Baltic Exchange to the north, and Exchequer Court to the west across St Mary Axe. Loss of daylight and sunlight to these commercial buildings would normally be viewed as less important than it would be to dwellings.



- 3.1.4 For the Environmental Statement, GIA have carried out a very thorough analysis of loss of light, including residential and religious buildings and a school. The full list is Petticoat Tower (Petticoat Lane Estate); 33 Great St Helens; St Helens Church Bishopsgate; St Andrew Undershaft Church; 4-8 Creechurch Lane; 10-12 Creechurch Lane; 14-16 Creechurch Lane; 18-20 Creechurch Lane; 2 Creechurch Lane; The Gibson Hall; 50 Bishopsgate; 52-68 Bishopsgate; 78 Bishopsgate (St Ethelburga's Centre); 150 Bishopsgate; 27-31 Mitre Street; 4 Heneage Lane Spanish And Portuguese Synagogue (Bevis Marks Synagogue); Sir John Cass's Foundation Primary School; St Katharine Cree Church; 26 Wormwood Street; Cornhill-St Peter Upon Cornhill Church; 50 Cornhill; 1-24 Wormwood Street; 25 Wormwood Street; 19 Old Broad Street (City of London Club); Merchant Taylors Hall B2; Drapers Hall; Merchant Taylors Hall B1; 2 Heneage Lane (Rabbi's House); 1-6 White Kennett Street; and 150 Bishopsgate.
- 3.1.5 Many of these buildings are some distance away, and the losses of daylight and sunlight would either be very small or zero. The nearest ones are the Bevis Marks synagogue and associated Rabbi's house; dwellings at 10-12, 14-16 and 18-20 Creechurch Lane; and St Andrew Undershaft and St Helens Bishopsgate churches.
- 3.1.6 Loss of daylight to the two churches would be very small, and most of the windows would have no loss of light. Loss of light to the synagogue would also be small. The adjoining Rabbi's house at 2 Heneage Lane would have a slightly larger relative loss of light, but still well within the BRE guidelines. One of the windows at second floor level appears not to have been analysed, but loss of daylight to this window would be expected to be well within the guidelines too.
- 3.1.7 The dwellings at 10-12 and 14-16 Creechurch Lane (Figure 2) would have the largest relative losses of light, although still within the BRE guidelines in all cases. The worst affected windows (in relative terms) appear to be smaller ones that may be obstructed by existing pillars on each side. Most of the rooms have larger windows that would be less affected. The windows that are closest to failing the guidelines, in the centre of 10-12, may light a circulation space.



Figure 2. 18-20 (on left), 14-16 and 10-12 Creechurch Lane.



- 3.1.8 18-20 Creechurch Lane would have lower relative losses of light. This is probably because it can receive some light from directly down Bury Street, which would be unaffected by the proposed development.
- 3.1.9 Overall, in the proposed versus existing scenario the loss of daylight for all the existing buildings would be within the BRE guidelines and assessed as negligible.
- 3.1.10 Nearly all the windows in the nearer buildings, discussed above, face within 90 degrees of due north and therefore loss of sunlight would not be an issue. Loss of sunlight to every existing window would be within the BRE guidelines, and assessed as negligible.

3.2 Cumulative assessments

- 3.2.1 In daylight and sunlight assessments there are two types of cumulative assessment that can be carried out and GIA have helpfully carried out both of them. Figure 3 shows their cumulative scenario.



Figure 3. Plan by GIA showing their cumulative scenario. The new development is in a teal colour and the proposed buildings are shown in purple. North is at the top of the plan.

- 3.2.2 The first type of approach is to compare the existing situation with the cumulative scenario. This gives the total loss of light for all developments. This can be helpful in situations where a number



- of proposed developments can all impact an existing building, because it indicates the total loss of light that an occupier would experience.
- 3.2.3 The results show that many of the existing buildings, including 33 Great St Helens, St Helens Church, St Andrew Undershaft, 2, 4-6, 10-12, 14-16 and 18-20 Creechurch Lane, 50 and 52-68 Bishopsgate, 27-31 Mitre Street, the Synagogue, St Peter's Cornhill, 50 Cornhill, 19 Old Broad Street, and 1-6 White Kennett Street would all have large cumulative losses of light. However in these cases the results are potentially misleading, because the cumulative scenario includes a large number of substantial proposed buildings. For nearly all of the above buildings, the loss of light would be largely due to the other proposed buildings in the cumulative scenario, and very little of it would be due to the Tulip.
- 3.2.4 The other approach that GIA have employed is to compare the cumulative scenario assuming all of the proposed buildings have been constructed except the Tulip, with the cumulative scenario including the Tulip. This is a more appropriate approach here as it allows the extra impact of the Tulip itself to be quantified.
- 3.2.5 The results show that for most of the existing buildings assessed, the additional impact of the Tulip would be very small and well within the BRE guidelines. The exceptions are one window in St Helens Church, which would have already lost nearly all its light as a result of the redevelopment of 1 Undershaft; and 10-12 and 14-16 Creechurch Street, discussed above. In each of these buildings six windows would have a relative loss of light outside the BRE guidelines, in that the vertical sky component with all the proposed buildings plus the Tulip would be less than 0.8 times the value with all the proposed buildings but without the Tulip. However, for all twelve windows the relative loss of light is only just outside the BRE guidelines, and each of the affected rooms has another window or windows that would meet the guidelines. Some of the windows may light circulation space. For these reasons the loss of light would be assessed as minor adverse.
- 3.2.6 In this cumulative scenario the additional impact of the Tulip on sunlight to all windows would be within the BRE guidelines.



4 Loss of sunlight to open spaces

- 4.1.1 Guidance on sunlight in outdoor spaces is given in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'. It gives a recommendation for outdoor spaces where sunlight is required.
- 4.1.2 The Report recommends that no more than half of such an area should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. Where this guideline is not met, the loss of sunlight is significant if the area with 2 hours sun on 21 March is reduced to less than 0.8 times its former value.
- 4.1.3 In Annex 5 'Overshadowing assessment' of the Environmental Statement Volume 3: Appendix 'Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare', GIA present loss of light analysis for five open spaces. These are St Helen's Church Bishopsgate, Jubilee Gardens (off Houndsditch), the courtyard of Bevis Marks Synagogue, the playgrounds at Sir John Cass's Foundation Primary School, and Aldgate Square.
- 4.1.4 The results show that there would be no change in the areas receiving sunlight on March 21. Loss of sunlight to the existing spaces would be within the BRE guidelines.
- 4.1.5 It is possible that none of these spaces would lose any sunlight at any time of year as a result of the new development. This is difficult to check, because the shadow plots in Annex 5 are small and hard to read. Nevertheless, any loss of sunlight can be assessed as negligible.
- 4.1.6 There are no other existing open spaces at ground level for which loss of sunlight might be an issue. However the building immediately to the north of the Tulip site, 6 Bevis Marks, has roof terraces that might lose sunlight as a result of the proposed development (see www.6bevismarks.com). Loss of sunlight to these spaces could be checked.



5 Solar glare

5.1 Disability glare to motorists and train drivers

- 5.1.1 The Environmental Statement gives a detailed analysis of glare to motorists and train drivers in Annex 6 of its Appendix on daylight and sunlight.
- 5.1.2 The Annex presents results for the current setting (including buildings under construction) plus the Tulip. This is appropriate. In an established urban setting, the risk of solar dazzle from a particular building generally decreases as more buildings are constructed nearby. This is because the surrounding buildings may prevent a view of the reflecting building, or may prevent sunlight from reaching it in the first place. Consequently, a cumulative analysis including additional proposed buildings generally results in the same, or fewer, instances of dazzle.
- 5.1.3 Annex 6 of the Environmental Statement Appendix presents helpful diagrams showing the areas of the building from which reflection can occur, and an indication of the time and day of the year when this can happen. The diagrams also show the angle between the line of sight of a typical observer and the reflecting glazing. This is useful because the severity of disability glare increases as this angle decreases (in general, it is proportional to the inverse square of the angle).
- 5.1.4 However the lines of sight have been calculated assuming that drivers will be looking directly at traffic lights on either side rather than focusing on the road in front of them. This is a questionable approach, because at road junctions drivers will need to be able to detect people crossing the road, or stationary vehicles or cyclists in their path. Using the centre of the lane as the centre of the field of view could result in the proposed building being closer to the line of sight for points E1, E2, NE1, NE2, N1, NW3, SW2 and SW3.
- 5.1.5 The times on the diagram are given in solar time, which approximates to Greenwich Mean Time (this is mentioned briefly on page 8 of GIA's Annex 6). If British Summer Time is in operation, one hour should be added to each of the times. In practice this makes little difference to the impact of the reflection, but it changes the exact times at which sun could be reflected.
- 5.1.6 Figure 4, taken from the solar glare Annex, shows the test points used. These are marked with arrows; the arrow indicates the direction of view. Black arrows indicate locations where the proposed development would not be visible because other buildings are in the way; in this situation no reflected solar glare could occur due to the proposed development. Green arrows indicate locations where the proposed development would subtend more than 30 degrees to the driver's line of sight; in these cases solar glare would be negligible (see paragraph 2.3.5 above). GIA have not carried out assessments for these locations, which is a reasonable approach provided that the lines of sight have been set up correctly (see 5.1.4 above).

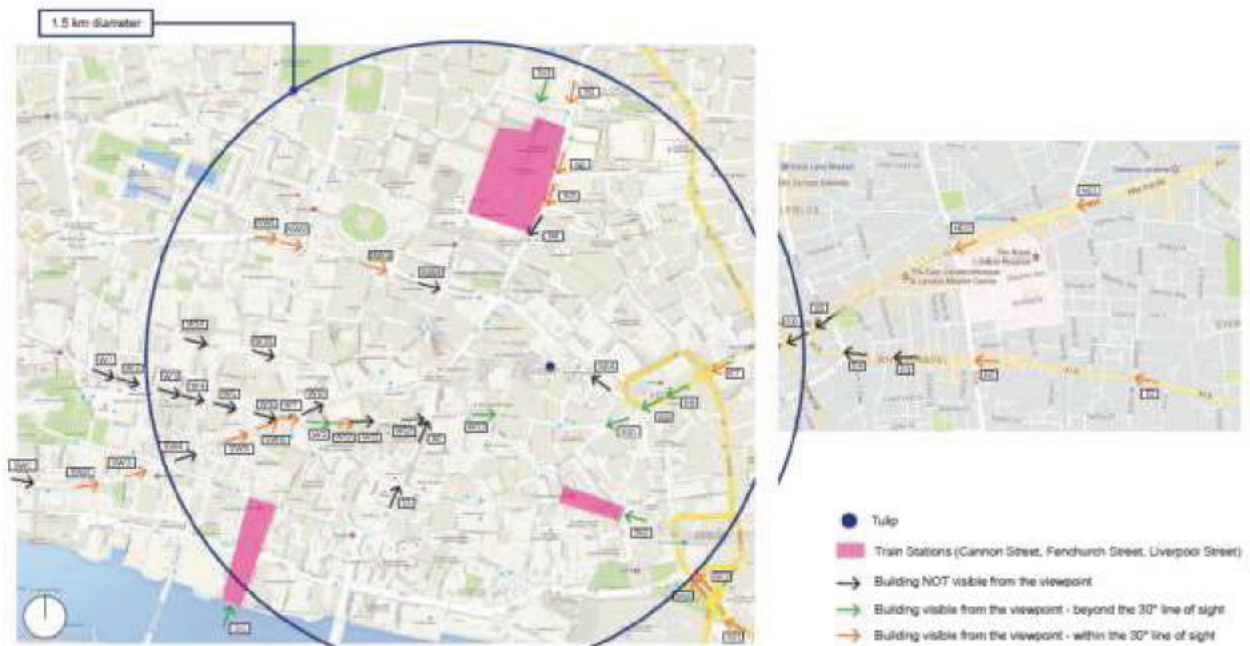


Figure 4. Plan showing test points used in the solar glare analysis. The tiny blue circle in the middle marks the outline of the proposal site.

- 5.1.7 In their analysis GIA have concentrated on the locations, marked with orange arrows, where the proposed development would be visible at an angle of less than 30 degrees to the line of sight. These test points appear to represent the main points at which motorists could see the building and potentially receive reflected sunlight from it. Most of the roads nearby have buildings on either side, which block views of more distant buildings.
- 5.1.8 In Figure 4 GIA's 1.5km diameter circle does not appear to be centred on the proposed development. However this does not matter, as there is nothing particular about a distance of 0.75km from the proposed development as far as glare is concerned.
- 5.1.9 The analysis has been carried out thoroughly, with a number of viewpoints on most of the surrounding approaches. For some viewpoints more than one line of sight has been analysed, to show the different effects to drivers in left and right hand lanes.
- 5.1.10 In Annex 6 GIA mention detailed glare calculations and modelling. However, in the EIA the impact assessment of glare has been carried out in a very simple way. Where the angle of view of the proposed development subtends more than 15 degrees to the line of sight, the impact is assessed as negligible. For eight locations where the angle of view subtends less than 15 degrees to the line of sight, the impact is assessed as minor adverse. As 5.1.4 above indicates, there is doubt about whether these angles have been calculated correctly.
- 5.1.11 However the degree of disability glare does not just depend on the angle of view. It also depends on the illuminance at the driver's eyes (the amount of light reaching their eyes). This depends on the reflectance of the glazing. The solar glare analysis does not specify the reflectance, but it is understood that low reflectance glazing will be used, which would tend to reduce glare.



- 5.1.12 More importantly, the illuminance on the driver's eye depends on whether the glazing is flat or curved. If the glazing is perfectly flat (see top of Figure 5), the illuminance at the driver does not vary significantly with their distance from the reflecting building (unless the glass is so far away that it can only reflect part of the sun's disk). But if the glazing is curved in a convex way, it spreads the light as the middle example in Figure 5 shows.

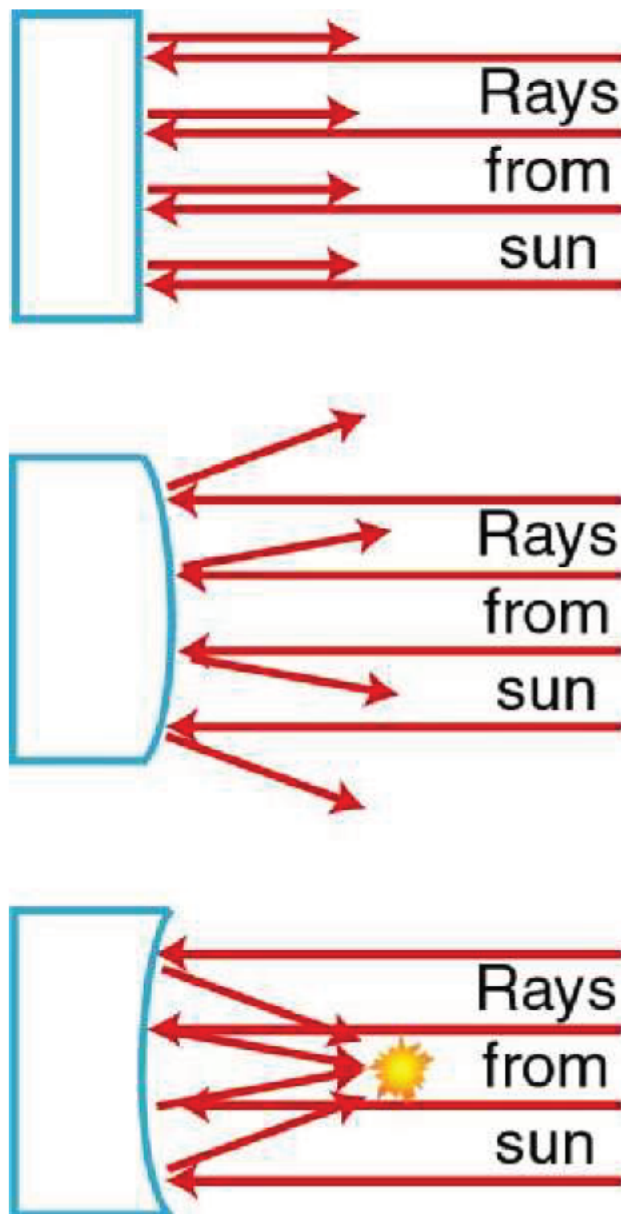


Figure 5. Solar reflection from different types of glazing. A flat façade (top) reflects the sun's rays as a parallel beam. A convex curved façade (middle) spreads the reflected rays, giving lower levels of reflected light over a wide area. A concave curved façade can concentrate the reflected light, giving a localised area of very high levels of light and radiation.

- 5.1.13 The glazing at the top of the Tulip, which would be visible from the road and rail locations considered, is exclusively of this convex form (according to the design and access statement, most of it is curved in two dimensions while the glazing near the top of the structure is curved in



three dimensions). This means that the illuminance at the driver's eyes will decrease markedly with distance from the building; for two dimensionally curved glass, the illuminance is approximately inversely proportional to the distance away, at long distances. This has the effect of reducing disability glare at distances of more than a few metres from the building.

- 5.1.14 In this particular case the height of the glazing above the ground means that it is only close to the driver's line of sight when it is a very long way away. The nearest points analysed by GIA are over 400 metres away. At these distances, the illuminances at drivers' eyes would be expected to have decreased sufficiently to result in negligible solar glare, even for angles of incidence below 15 degrees.
- 5.1.15 There is a mistake in paragraph 11.126 of the Environmental Statement, which states that 'the convex nature of the façade... will further reduce the amount of time when the solar reflections will be visible'. This is incorrect. In fact, a convex façade substantially increases the amount of time when solar reflections are visible, because it allows sunlight to be reflected from a much wider range of sun positions. However, the illuminance produced by the reflected image is much lower, which is what limits the disability glare.

5.2 Views from townscape/heritage viewpoints

- 5.2.1 The Environmental Statement also assesses the effects of solar reflection on the appearance of the townscape as seen from six viewpoints. All the viewpoints chosen are a substantial distance away; the nearest is around 500m away. For the reasons given above, this limits the overall amount of light reflected to a particular location. Seen from one of these viewpoints at the times reflection can occur, the tower glazing would appear to sparkle, rather than create a dazzling beam of glare.
- 5.2.2 Thus the solar reflection would have a negligible additional impact on the overall enjoyment of these views (over and above any impact from the visibility of the structure itself, which is not assessed here).

5.3 Solar convergence

- 5.3.1 Solar convergence happens when a building focuses the sun's rays. This can cause localised areas of concentrated solar radiation which can sometimes result in safety hazards and damage. Outdoors, it only happens when a reflective structure has a concave arrangement of elements which focus the sun's rays. The bottom part of figure 5 shows how such a façade can concentrate sunlight in this way.
- 5.3.2 In the table at the start of the Environmental Statement chapter 11, the last line states that 'a Solar Convergence assessment is not considered necessary due to the convex shape of the reflective elements of the Proposed Development... Solar convergence is only possible on concave facades and will therefore not occur as a result of the Proposed Development's facades'.
- 5.3.3 However, the proposed development does contain concave glazed façade elements. These are positioned at low level, on the Pavilion (reception) building, and at the bottom of the Tulip tower itself. Figure 6 shows where they are. The Pavilion glazing covers two storeys plus a parapet. The glazing on the Tulip tower is around 17 metres high, although it tapers as it goes up.

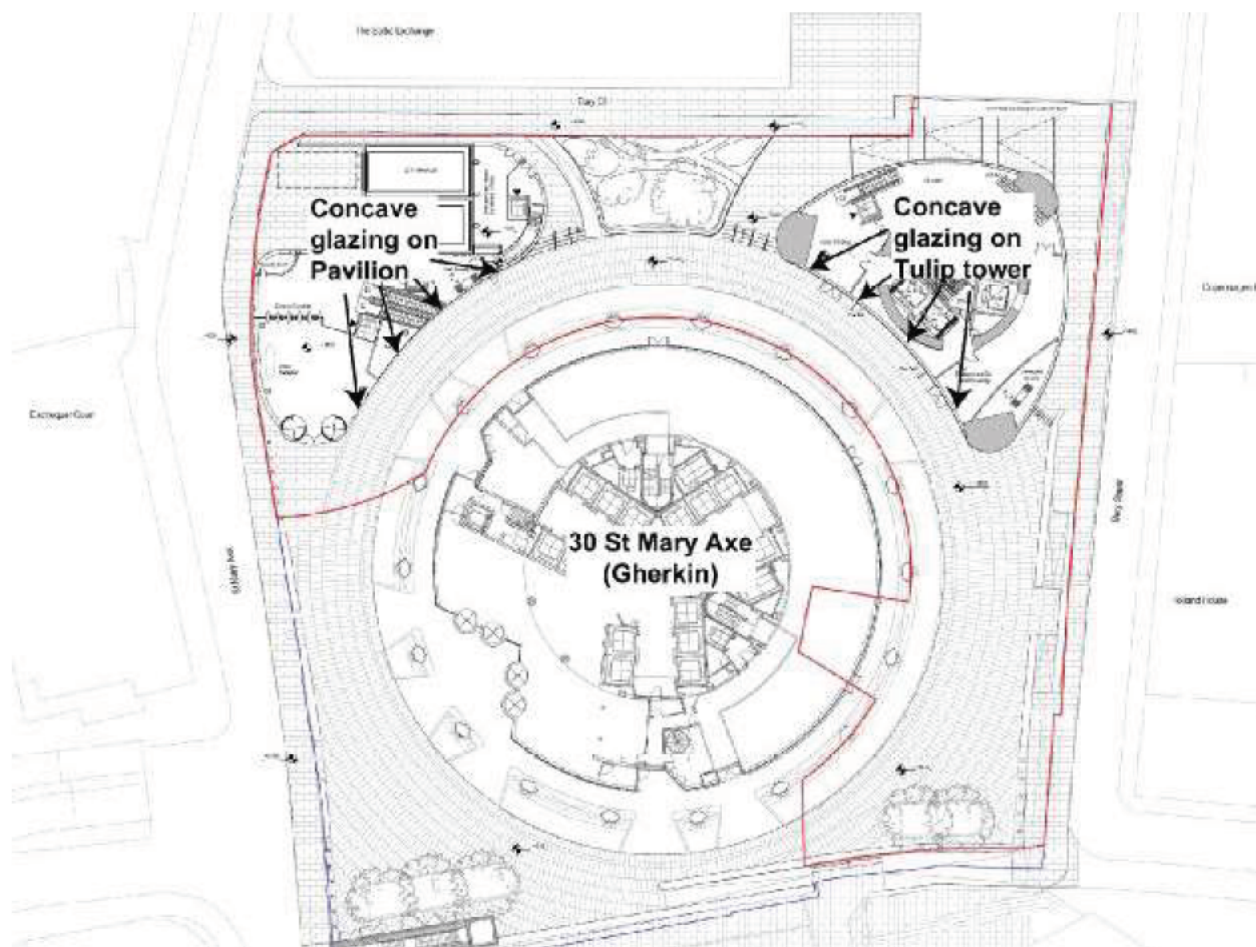


Figure 6. Ground floor plan by Foster and Partners, annotated to show location of concave glazing elements.

- 5.3.4 It appears that sunlight can reach both areas of glazing (although the Pavilion glazing may be partly overshadowed at the critical times by the Leadenhall building and 1 Undershaft). Therefore solar convergence should have been considered.
- 5.3.5 The principal obstruction restricting incoming sunlight is the Gherkin (30 St Mary Axe) which is close by. The curved red line on Figure 6, opposite the Pavilion and Tulip tower, corresponds approximately to the outer envelope of the Gherkin, which is the effective obstruction for sunlight reaching these facades. This means that as long as the Gherkin is there, sunlight can only reach the concave facades on the base of the Tulip tower and Pavilion at an oblique angle.
- 5.3.6 This limits the convergence effect. Initial very rough ray tracing suggests that instead of the sun's rays converging to a point, the reflection will form an optical 'caustic' or extended area of high levels of reflected light, possibly in the walkway between the Pavilion and Tulip tower and the Gherkin.
- 5.3.7 It is recommended that a more detailed study be carried out to establish the levels and locations of concentrated reflected sunlight. Guidance for the City of London recommends that at street level where people are present, areas with reflected irradiances above 1.5kW/m^2 , and preferably those above 1kW/m^2 , should be minimised.



5.4 Discomfort glare to occupants of nearby buildings

- 5.4.1 The Environmental Statement has not considered discomfort glare to occupants of nearby buildings. Discomfort glare is a less serious problem because it does not impair the ability to see. Inside a building where glare could be an issue, shading devices such as blinds or curtains are generally provided, and therefore occasional discomfort glare can easily be controlled using such shading devices. In such spaces, discomfort glare due to reflected sun would be a significant issue if its occurrence was so prolonged as to affect the amenity of the space by requiring the continual additional use of blinds and curtains over long periods.
- 5.4.2 The high level glazing in the Tulip is significantly above the level of most of the surrounding buildings (including the Gherkin), which limits the penetration of reflected sunlight into their interiors. Only the upper floors of those buildings which approach the height of the Tulip, such as 22 Bishopsgate, would be expected to have views of the reflecting glazing from more than a small area of their floor plate. Such buildings would be expected to be fitted with blinds or other shading devices to control glare, and the convex shape of the Tulip reduces the amount of light reflected in any particular direction. Therefore the risk of additional discomfort glare due to this glazing is not expected to be significant.
- 5.4.3 The possibility of concentrated reflected glare from the concave low level glazing elements of the Tulip tower and Pavilion should be considered, in the unlikely event that solar convergence could occur within occupied areas in the Gherkin (30 St Mary Axe). This should form part of the solar convergence study mentioned above.



6 Conclusions

- 6.1.1 This report has analysed the Environmental Statement daylight and sunlight chapter, prepared by GIA, for a proposed visitor attraction, the 'Tulip', on land adjacent to 20 Bury Street, London EC3A 5AX. The assessment has been carried out against the guidelines in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.
- 6.1.2 GIA have analysed loss of light to all the nearby existing dwellings, and religious and educational buildings, that could be affected. Loss of daylight and sunlight to all these buildings would be within the BRE guidelines, and would be assessed as negligible.
- 6.1.3 GIA have also carried out a cumulative assessment including other proposed buildings. Though a number of the surrounding buildings would have large cumulative losses of light, for nearly all of them this would be largely due to the other proposed buildings in the cumulative scenario. The additional impact of the Tulip would be very small and well within the BRE guidelines. The exceptions are one window in St Helens Church, which would have already lost nearly all its light as a result of the redevelopment of 1 Undershaft; and 10-12 and 14-16 Creechurch Street. The Tulip would result in an additional relative loss of daylight marginally outside the BRE guidelines to six windows in each of these latter two buildings. This would be a minor adverse impact. The additional impact of the Tulip on sunlight to all windows would be within the BRE guidelines.
- 6.1.4 Loss of sunlight to five existing open spaces nearby has also been analysed. On March 21, the key date for assessment in the BRE guidelines, there would be no additional overshadowing of these areas. The loss of sunlight would be negligible, easily meeting the BRE guidelines.
- 6.1.5 There are no other existing open spaces at ground level for which loss of sunlight might be an issue. However the building immediately to the north of the Tulip site, 6 Bevis Marks, has roof terraces that might lose sunlight as a result of the proposed development. Loss of sunlight to these spaces could be checked.
- 6.1.6 Reflected solar disability glare to surrounding roads and railways would be negligible. This is because the glazing at the top of the Tulip is curved and would spread the reflected light over a wide area, limiting the amount of light reaching a particular location. Reflected discomfort glare from the high level glazing to surrounding commercial buildings is not expected to be significant.
- 6.1.7 The development has areas of glazing at low levels, at the base of the Tulip tower and in the proposed Pavilion building, that are concave and could potentially focus the reflected rays of the sun. The existing Gherkin (30 St Mary Axe) building means that incoming sunlight reaches these concave facades at an oblique angle, which may make a sharply focused area of reflected light less likely. Nevertheless, it is recommended that a more detailed study be carried out to establish the levels and locations of concentrated reflected sunlight.



7 References

1. P J Littlefair. 'Site layout planning for daylight and sunlight: a guide to good practice' Bracknell, IHS/BRE Press, 2011.
2. P J Littlefair. 'Solar dazzle reflected from sloping glazed facades' BRE Information Paper IP3/87. Bracknell, IHS/BRE Press, 1987.
3. 'International Lighting Vocabulary' CIE Publication 17/4. Commission Internationale d'Eclairage, Vienna, 1987.
4. D A Schreuder. 'The visual cut off angle of vehicle windscreens' Lighting Research and Technology, 17 (4) 192-193, 1985.
5. L Cochran. 'Solar glare events from glazed curtain walls' Proc ANZSES conference, Brisbane, 1988.
6. British Standards Institution 'Road lighting —Part 2: Performance requirements' BS EN 13201-2, BSI, Milton Keynes, 2003.
7. British Standards Institution. 'Code of practice for the design of road lighting — Part 1: Lighting of roads and public amenity areas' BS 5489-1, BSI, Milton Keynes, 2013.

From: Littlefair, Paul
To: [Depala, Bhakti](#)
Subject: RE: The Tulip - Solar Convergence
Date: 15 March 2019 10:59:06

Dear Bhakti

Thanks for your message and for sending me GIA's report on solar convergence. I had a quick look at it on the train to London yesterday.

It appears that solar convergence is more of a problem than I had anticipated. I note that GIA's assessment assumes that three mitigating measures have been adopted (p4 of their report): faceted glazed facades, a canopy on the base of the Tulip, and projecting slabs on the Pavilion building. We have to assume that these changes are critical in controlling the effects of solar convergence, and you will need to make sure that they are incorporated into the buildings if they are constructed (maybe with a planning condition??).

GIA have done a very thorough study, modelling the outdoor space every five minutes for each month of the year. Because of the layout of the glazing, solar convergence on intermediate dates is unlikely to be significantly worse. They have made worst case assumptions about the irradiance from the sun. I assume that the buildings have been modelled correctly; on GIA's illustrations, I wasn't entirely clear what was where.

GIA have correctly reproduced our recommendations in the Fenchurch Street study and your Planning Advice Note. The relevant recommendation here is that 'For areas at street level where people are present, areas with reflected irradiances above 1.5kW/m^2 , and preferably those above 1kW/m^2 , should be minimised.' GIA have shown that reflected irradiances would not exceed 1.5kW/m^2 at any time, meeting the guidance, although they would exceed 1kW/m^2 in limited areas. Total irradiances, including the sun itself, could exceed 2kW/m^2 on isolated occasions and in limited areas.

The main driver behind the recommendation is the need to avoid eye damage to people in the open space outside. Because of the geometry of the space with relatively high angle sun reflecting from glazing close to the observer, eye damage is less likely because the sun will be reflected from panes in different parts of the field of view, or maybe outside the field of view altogether. Also people would not be expected to be able to see the sun and its reflection simultaneously. So from this point of view, adopting the more relaxed recommendation of 1.5kW/m^2 for reflected radiation alone, is appropriate.

Our report for 20 Fenchurch Street did identify other potential hazards arising from solar convergence. One of these is local overheating of the space causing heat stroke and other medical problems. There could be unusually high temperatures in the limited area in front of the Tulip entrance for the period of time (typically 1130-1220 GMT or 1230-1320 BST in summer) when the sun and its reflection converge on the space. Accordingly, we would recommend that people should not be allowed to queue in this area at these times, and that there should not be people (for example stallholders or stewards) working in this area then. People moving quickly through the space should be relatively unaffected.

Another potential hazard is burns to people's skin from touching hot metallic objects like door handles or some types of street furniture (for example bins or seating). This is hard to predict, but to be on the safe side it is recommended that non-conductive, heat resistant, non-metallic materials be chosen for objects in the critical area.

I hope this is helpful. Let me know if you need a more detailed review and I will prepare a quote for this work.

Best regards

Paul Littlefair

Dr Paul Littlefair

For and on behalf of BRE, Bucknalls Lane, Garston, Watford, WD25 9XX

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From: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>

Sent: 14 March 2019 10:16

To: Littlefair, Paul <Paul.Littlefair@bregroup.com>

Subject: FW: The Tulip - Solar Convergence

Dear Paul,

As discussed, please see attached the solar convergence report the applicants prepared following comments you made in the independent assessment.

I would be grateful for your comments.

Kind regards,

Bhakti Depala

Senior Planning Officer

Development Division

City of London

0207 332 1711

From: Peter Twemlow [REDACTED]

Sent: 07 March 2019 17:29

To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>

Cc: Pearl Figueira [REDACTED]
Subject: The Tulip - Solar Convergence

Bhakti

As promised, please find attached Solar Convergence Assessment prepared by GIA with input from Foster + Partners.

The final testing (to which the assessment relates) has been based on three adjustments to the scheme:

- Faceted glass for sections of both the Pavilion and the base of the Tulip;
- An added canopy at the base of the Tulip;
- An added projection of the slabs for the Pavilion.

In terms of how this is dealt with in the recommendation / officers report, essentially the required minimal mitigation has been worked out now (usually obligation requires testing and then mitigation in place post consent?) . We can therefore accept a condition requiring mitigation works to be undertaken in accordance with this document? Or, the condition requires us to formally (re)submit this doc and comply with mitigation requirements?

Happy to chat through mechanics, but hopefully this helps settle this point.

Thanks

Peter.

Peter Twemlow

Associate Director

direct: [REDACTED]
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City of London
The Tulip Pedestrian Review
Independent Review Report

Issue | 28 February 2019

This report takes into account the particular instructions and requirements of our client

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party

Job number 266548-00

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ARUP

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1 Introduction

1.1 Background

Arup have been commissioned by the City of London Corporation (CoL) to carry out an independent review of a Pedestrian Movement Assessment submitted in relation to the ‘Tulip’ development at land adjacent to 20 Bury Street, London.

An application for the proposed development was submitted to the CoL on 14th November 2018 (planning ref: 18/01213/FULEIA). The development will involve the construction of a tall building (305.3m AOD) for a mixed used visitor attraction on the north side of 30 St Mary Axe (the Gherkin), using land that currently forms part of the public realm. The tall building will have a viewing gallery and educational facility, restaurants and bars. There will also be an associated pavilion building to provide entry and exit accommodation for the visitor attraction, retail units, new and improved public realm, cycle parking, servicing and plant room space.

The Transport Assessment (TA) assesses development impacts for a typical busy day in the high season, comprising an average of the 20-30 busiest days per year. On the typical busy day, the overall development is expected to generate 17,700 trips a day, with 574 trips taking place in the AM peak hour, and 1,740 trips in the PM peak hour. It has been assumed that most users will access at the area by National Rail and London Underground services.

The Pedestrian Movement Assessment report as part of the TA identifies that the proposed development is not expected to have a significant adverse effect on pedestrian comfort and safety around the site. The City of London requires an independent audit of these documents to ensure that these conclusions are robust.

1.2 Documents Reviewed

The following documents from CoL’s online application database have been reviewed:

- Transport Assessment prepared by Steer;
- Pedestrian Movement Assessment prepared by Space Syntax; and
- Existing Site Plan, Proposed Site Plan and floor specific plans with general arrangement all prepared by Foster + Partners.

Other documents reviewed:

- CoL Transport Strategy (Drafted for consultation, November 2018);
- Transport for London (TfL) and CoL’s comments on the Pedestrian Movement Assessment; and
- Applicant’s response to TfL and CoL’s comments on the Pedestrian Movement Assessment.

- Pedestrian Movement Assessment – Points of Clarification (PoC) Draft 02 by Space Syntax, 27 February 2019.

1.3 Report Structure

This report comprises of four further sections:

2. Observations from the Site visit and Site Plan;
3. Key points from the Assessment Review Meeting (22nd January);
4. Additional Identified Issues; and
5. Summary and Recommendations.

2 Site Visit and Inception Meeting

2.1 Observations from Arup site visit and site plan

General access and internal movement

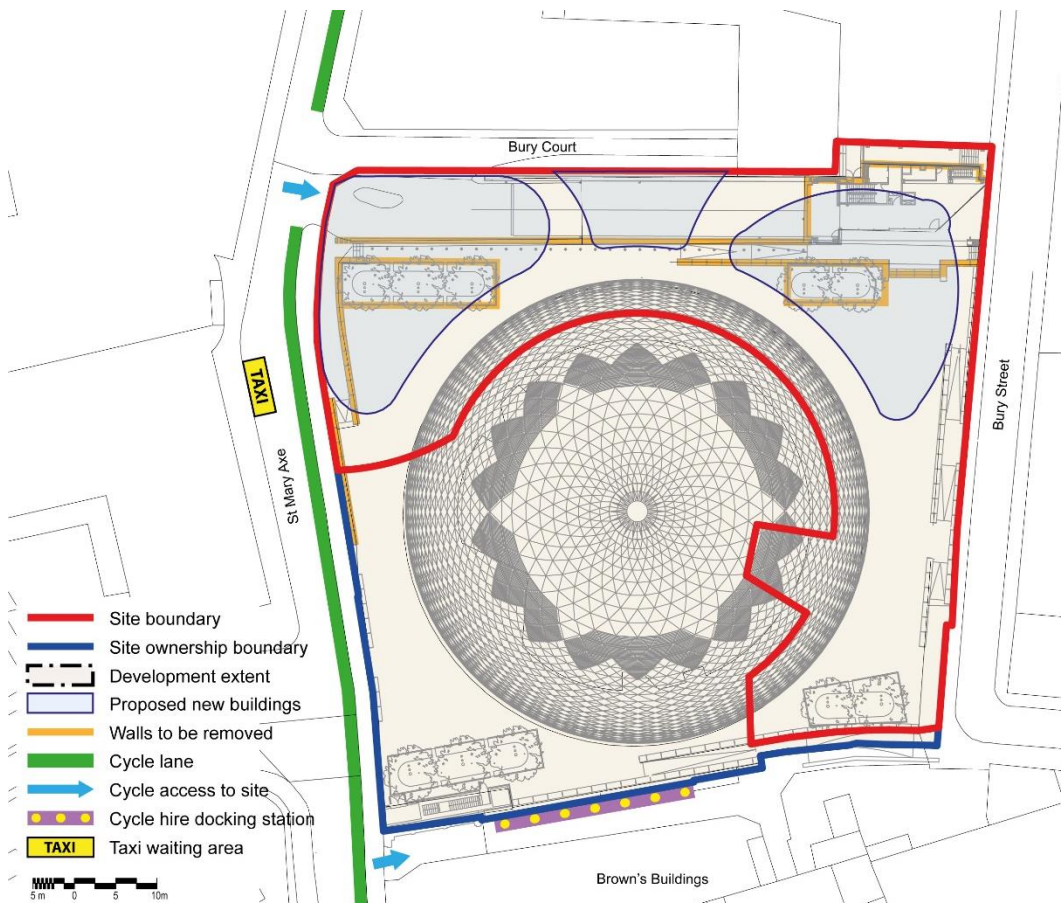
The proposed development will make no change to the existing highway network adjoining the site, or associated pedestrian footpath network. St Mary Axe, the western perimeter of the site, will continue as the primary access for private vehicles, servicing vehicles, taxis, cyclists and pedestrians. Bury Street on the eastern perimeter will continue to operate as the minor access for some users accessing from the east. The development will, therefore, have limited impact on how users will access and move around the site and surrounding area.

However, the Tulip development and its building footprint will significantly change public realm areas and pedestrian routes in the site area.

The removal of servicing ramps (to be replaced with vehicle lift), a small building, and some boundary walls will create a more legible space with more defined pedestrian route between St Mary Axe and Bury Street via Bury Court.

Overall however the new buildings and associated landscaping will reduce space and effective widths for pedestrian movement and occupancy at ground level.

Figure 1: Site plan with proposed changes



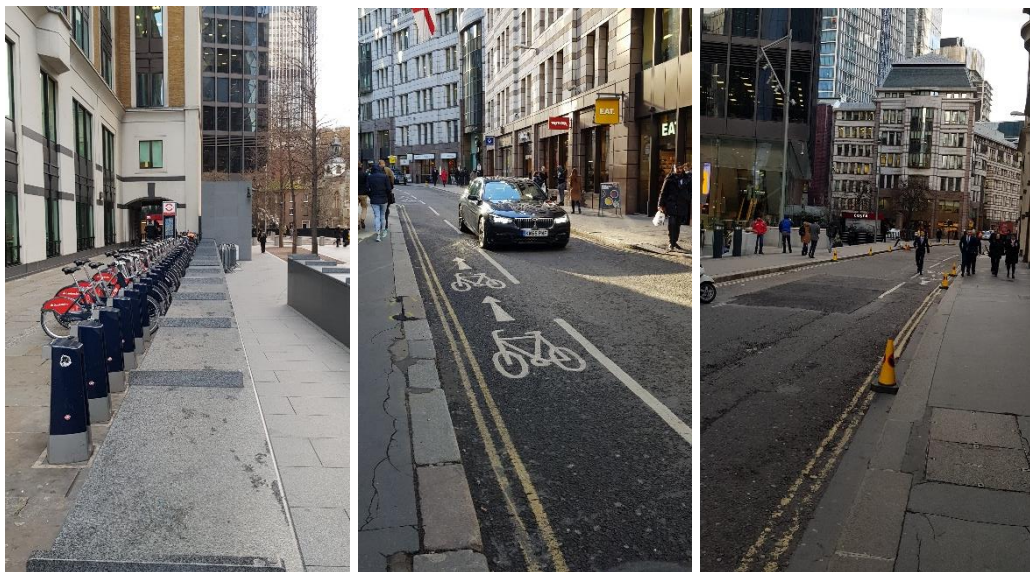
Cyclist access and internal movement

At present, St Mary Axe is the primary access route used by cyclists. In addition to its northbound traffic lane, there is a southbound contra-flow cycle lane running from Bevis Marks to the north to Leadenhall Street to the south of St Mary Axe.

On-site basement cycle parking for the Gherkin is currently accessible from the servicing ramps at the north-west corner of the site via Bury Court. According to the Ground Floor Plan submitted as part of the planning application, the proposed development will provide a new automated cycle storage system with 284 spaces at approximately the same location off Bury Court. There is no information on existing provision, but it is known that the 284 spaces is significantly greater than the existing provision.

Outside the site boundary, adjacent to the Brown's Buildings to the south, there is a Santander Cycles hire station along the pedestrianised area as indicated in Figure 1. The docking station is located behind the low-level boundary wall which forms a partial barrier between Brown's Buildings and the public realm space to south of the Gherkin. Since this area is beyond the site area there will be no changes to this area.

Figure 2: Existing cycling provision



Other activities on-site

In addition to function as a pedestrian circulation route, open space around the Gherkin also serves as public realm space which is frequently occupied by both local workers and visitors, particularly at lunch time. The surrounding low-level walls provide seating in this area.

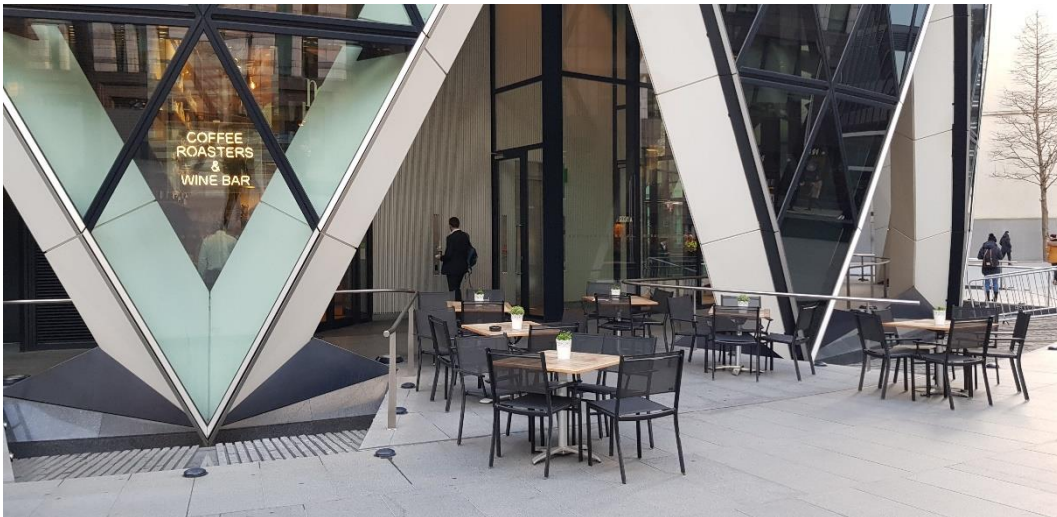
Figure 3: Public realm space between the Gherkin and Bury Court



As a result of high footfall, the area is also popular with street vendors, during the site visit, a street vendor selling flowers from a bicycle was present on the footway of St Mary Axe during lunch time site visit.

Restaurants and cafes located on the ground floor of the Gherkin also have outdoor seating which occupy some of the space as shown in **Figure 4** below. At peak periods, queueing from these units may also extend onto the public realm.

Figure 4: Seating associated with retail units at the base of the Gherkin



2.2 Key points from Assessment Review Meeting (22nd January)

Point 1 – Does the ‘Future Baseline’ scenario fully capture recent growth in pedestrian movement in the local area? Have contemporary empirical surveys been taken in person and on-site to establish an accurate baseline?

Applicant’s response:

- The ‘Future Baseline’ is based on a 2015 Baseline with the assumptions of additional movements being generated by committed developments plus a further 9% background increase to account for further population growth. The committed developments that are currently included in the scenario are 22 Bishopsgate, 1 Undershaft and 100 Leadenhall. 1 Leadenhall Street is excluded as its planning application has only been approved recently.
- Recent surveys completed on a neutral day with fine dry weather in October 2018 showed slightly reduced level of pedestrian movement across the count sites. Hence the worst-case 2015 Baseline counts have been used.

Actions agreed during the review meeting:

- Revision to Future Baseline to include 1 Leadenhall Street.

Arup review comments:

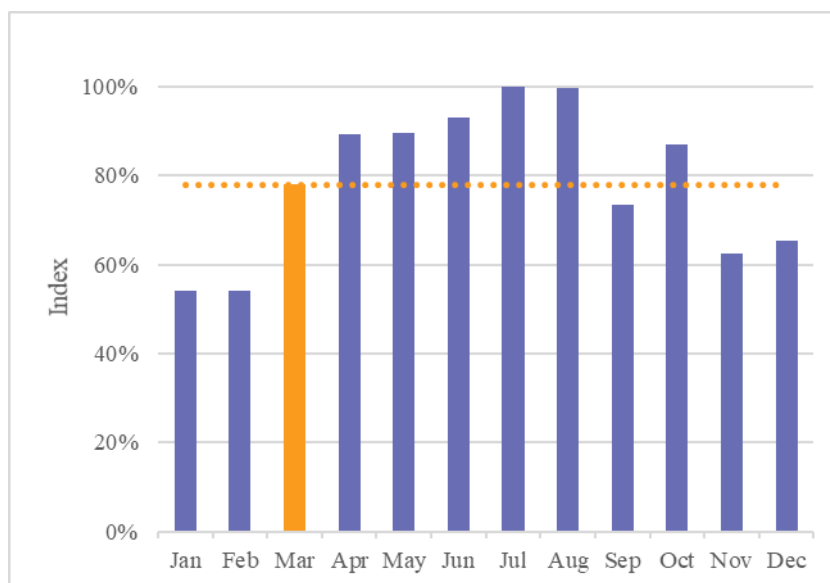
- The lower observed pedestrian numbers in the October 2018 survey compared with counts from March 2015 are surprising. As a result of development completed in the intervening period it would be expected that pedestrian numbers would have increased. The lower counts could be due to transport disruption in October 2018, for instance, the London Underground drivers’ strike actions which led to closure of the Central Line and cancellation of South Western Railway services in to London Waterloo on 4th and 5th October. Confirmation is required that the date of the October 2018 survey did not coincide with any events of industrial action or public transport disruption in the area. If the date did not coincide with disruption but was in the same week it could still be that there were residual impacts on occupancy of local offices.
- Space Syntax’s PoC note confirms that the 2018 surveys were undertaken on Thursday 18th and Saturday 20th October 2018. Both dates are in a ‘neutral’ month outside school holidays but close to the Autumn half-term week which began on Monday 22nd October. There was also a consecutive five-day strike action from Tuesday 23rd October leading to disruption to South Western Railway services to London Waterloo¹.
- The lower counts could also be due to current occupancy levels of the new developments. It is generally recognised that new developments do not reach full occupancy immediately after opening but gradually build up over time. With the new development in the area, occupancy is likely to increase after key infrastructures like the Elizabeth Line opens at Liverpool Street. For this assessment to be future proved, we would recommend a sensitivity test with a

¹ <https://www.itv.com/news/meridian/2018-10-22/south-western-railway-to-stage-five-day-strike/>

further uplift of around 10% (on top of the new development generation and the 9% background increase).

- Having the Future Baseline set in March instead of a summer month would also mean that the assessment could be underestimate background visitors and tourist footfall to the area. Tourism statistics published by the City of London indicate that July and August are the busiest months for City of London attractions. The number of visitors to the area over this period can be 10-20% higher than that in March with typically more visitors during the weekdays. These high numbers would however be offset by lower office occupancy as workers take summer holidays however visitor numbers in April/May/June and October are all markedly higher than in March.

Figure 5: Seasonal profile of visitor to CoL’s attractions



Point 2 – Are Pedestrian Comfort Levels (PCLs) and Fruin’s Level of Service (LoS) calculated for the narrowest point on all footways at all ‘Focus locations’? Does the ‘narrowest point’ account for obstructions from site activities, such as outdoor café seating, entrances to buildings?

Applicant’s response:

- The PCL calculations have been assessed for the narrowest point on all footways.
- Some cafes at the base of the Gherkin will no longer be permitted to have outdoor tables and seating.

Actions agreed during the review meeting:

- Revise assessment report to show the exact location of the narrowest points.

Arup review comments:

- A site audit is recommended to review the use and occupancy of public space at these focus locations and how they affect the effective width that is available for pedestrian movement. The assessment report should include cross-section drawings to clarify how the effective widths quoted have sufficiently accounted for stationary obstructions and any uses that may reduce the effective widths.

Page 18 of the Space Syntax’s PoC note shows cross sections and photographs of the narrowest points on the pavements around the Site. The measurements and calculations of effective widths comply with TfL’s Pedestrian Comfort Guidance for London².

Point 3 – Why has visitor behaviour for the Gherkin been used to predict expected visitor routes around the Tulip when the former is an office building and the latter would be a tourist attraction?

Applicant’s response:

- No clear response given by Space Syntax, but consensus from the discussion was that there is no suitable data available to represent visitor behaviours.

Actions agreed during the review meeting:

- Visitor behaviours, such as arrival and depart profiles, should be based on similar attractions locally in London, for instance, visitors to The View at the Shard and the Sky Garden at 20 Fenchurch Street.

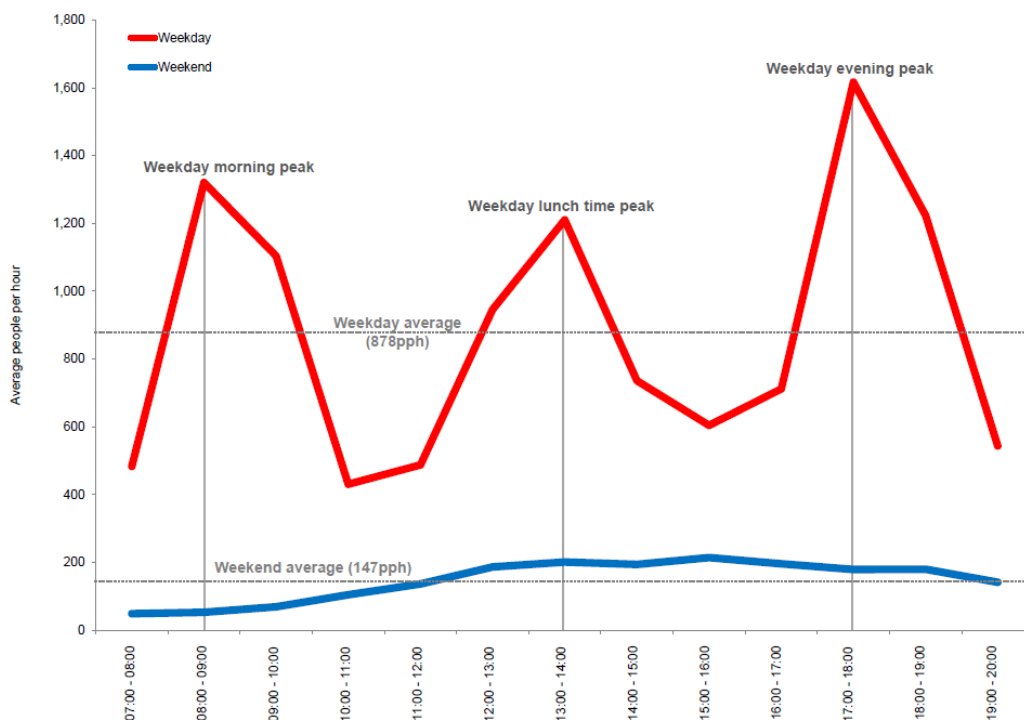
² Pg9, <http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>

Point 4 – Should Design Day include an assessment of lunch time peak?

Applicant's response:

- As can be seen from the daily movement profile in **Figure 6**, the weekday morning, lunch time and evening peaks has a 'W' shaped profile, with the lunch time peak being the lowest of the three. The current assessment has used the evening peak as the busiest point of the day.
- The lunchtime issue is more related to occupancy than movement. Level of Service does not account for occupancy and currently, there is no guideline on assessing occupancy and movement in combination.

Figure 6: Existing baseline: Daily movement patterns (extract from Pedestrian Movement Assessment by Space Syntax)



Actions agreed during the review meeting:

- Suggestion made to compare with other public realms in the local area such as Festival Gardens to see how occupancy affect movements and vice versa.

Arup review comments:

- The development will change public realm quality, creating a more welcoming environment for social mixing, and hence attracting further movement and occupancy. Recent Gehl Institute research shows that places with better urban quality can significantly increase the amount of staying activities in public space³. It is unclear whether the current Pedestrian Movement Assessment has sufficiently accounted for the impact of these occupancy activities, and how

³ The Public Life Diversity Toolkit, Version 2.0 March, 2016, Gehl Institute, [https://issuu.com/gehlarchitects/docs/public life diversity toolkit v2 fo](https://issuu.com/gehlarchitects/docs/public_life_diversity_toolkit_v2)

movement would impact on the quality of the public realm. Therefore, the suggestion to look at Festival Gardens is recommended.

On occupancy activities, Page 24 of Space Syntax's PoC note shows snapshots from CCTV footage around the site comparing lunchtime occupancy with peak hours across the day. It concludes that while there is a clear lunchtime peak for occupation, the levels are low (90 activities in an hour). We would reiterate our previous comments made in Point 1 that October 2018 may not provide a strong evidence of recent pedestrian movements. The snapshots also show how restaurant signs, outdoor seating, food trucks and waste collection bins occupy footways during the lunchtime peak. As the new development will significantly reduce usable area and width between Bury Court and the Gherkin, it is important to ensure that the site manager has measures in place to avoid impact to adjacent highway network, particularly St Mary Axe North where existing footpath are already narrow.

On 'peak occupancy demand' shown in Page 26 of Space Syntax's PoC note, the total number of people in the plaza listed in the table do not add up to 388. Also, the number of additional non-paying visitors should be 80 instead of 20 (as suggested in the fifth bullet point in the text). As a result it is considered that the calculation of peak occupation should therefore indicate a maximum of 434 people.

Space Syntax PoC note provides a set of case studies of public open space precedents with calculation of space per person. These precedents are useful in drawing comparison with the future situation at the base of the Gherkin where it is anticipated peak occupancy will result in 5.9 sqm per person which lies within the range of case studies presented. The case studies illustrate that even in public open spaces with significantly dense occupation people still choose to use these places to congregate, relax and eat lunch. A precedent raised by the CoL is Festival Gardens, which has a comparable density of 6.6 sqm per person only slightly lower than the future situation at the base of the Gherkin.

- It would also be useful to look at how movement patterns vary between seasons as it is likely that the March 2015 survey would have less lunchtime activity than other times of the year with warmer weather, and hence underestimate lunchtime movement levels. If available, it would be instructive to review occupancy at warmer times of the year.

Point 5 – Does the assessment incorporate architectural tourists? Is Flickr data truly representative of tourist distribution?

Applicant's response:

- Current assessment assumes that 20 architectural tourists will be present visiting the public space on site at any one time, but these numbers have not been included in the pedestrian model.
- The Flickr data does not provide demographic insight of the users but is considered representative of the expected architectural tourists.

Actions agreed during the review meeting:

- None.

Arup review comments:

- Architectural tourists are considered unlikely to result in significant impact, as most would visit the site during 'off-peak' times and weekends. The number of architectural tourists visiting the site during the three typical peak periods – morning, lunch time and evening peak, is likely to be negligible in the context of overall numbers.
- Use of the Flickr database is innovative and judged to be a good approach however it is noted that the considered period extends back to 2013 when many of the current landmark buildings were still under construction. As such it is considered likely that routes may have changed. This is not considered a significant issue.

Point 6 – What is the person capacity of the visitor reception area and the Restaurant and Bar Welcome Lounge? Will there be adequate space to accommodate arriving visitors and restaurant patrons?

Applicant's response:

- Visitor numbers to the Tulip will be constrained by fire regulation, and all visitors will require prior booking for specific time slots. Therefore, the number of visitors arriving and leaving at any one time will be controlled to avoid congestion of the reception area in the pavilion building.
- Restaurant patrons will use dedicated entry and exit located at the ground floor of the Tulip. A dedicated security area is included in the design to accommodate this.

Actions agreed during the review meeting:

- None.

Arup review comments:

- In order to ensure the mode of operation it is recommended that the approach to visitor booking is secured by planning condition to ensure that demand and congregation at the pavilion building are representative.

Point 7 – Does the worst-case scenario pass CoL’s Draft Transport Strategy and TfL’s Guidance which recommend the minimum comfort level of B+?

Applicant’s response:

- The PCL for the worst performing section i.e. St Mary Axe N, in the ‘Future Baseline’ scenario is subsidy C- which is two levels below the required Level B+. With the Tulip development in place, the comfort condition for St Mary Axe N is expected to deteriorate but would remain at C- which is not considered a material change to comfort level.

Figure 7: Comparison of Level of Service

Location	Future baseline							
	Movement demand		PCL			Fruin LoS		
	Average	PM Peak*	Average	PM Peak	C+ peak % capacity	Average	PM Peak	LoS C peak % capacity
St Mary Axe N	2,984	5,990	B	C-	116%	A	B	65%
St Mary Axe S	3,453	6,682	A-	B	57%	A	A	27%
Undershaft	2,143	4,429	A	A-	28%	A	A	13%
Bury St N	665	1,546	A	B+	48%	A	A	34%
Bury St E	449	713	A	A-	36%	A	A	41%
100 LS	629	1,588	A+	A	20%	A	A	9%

Future baseline – PM peak

Location	Future + Tulip (Design day)							
	Movement demand		PCL			Fruin LoS		
	Average	PM Peak*	Average	PM Peak	C+ peak % capacity	Average	PM Peak	LoS C peak % capacity
St Mary Axe N	3,487	6,599	B	C-	128%	A	C	72%
St Mary Axe S	3,984	7,326	A-	B	63%	A	A	30%
Undershaft	2,303	4,620	A	A-	30%	A	A	14%
Bury St N	709	1,598	A	B+	50%	A	A	35%
Bury St E	507	782	A	A-	40%	A	A	45%
100 LS	774	1,762	A+	A	22%	A	A	10%

Future baseline + the Tulip (Design day) – PM peak

Actions agreed during the review meeting:

- None.

Arup review comments:

- Review results when the revised assessment become available.

3 Additional Identified Issues

Point 8 – Has the pedestrian movement assessment or other assessments looked at cyclists’ arrival and departure profiles and how they relate to the operational capacity of the automated cycle store system?

- It is expected that the cycle store system can only receive or return a limited number of bicycles at any one time. However, the majority of cyclists are likely to arrive/depart at around the same time which may lead to waiting/queuing at the facility. There should be a capacity assessment for the cycle store system and its implication on queues in public space, and the subsequent impact on effective width.

The ‘Internal layout assessment’ shows the required external queuing space on ground level and mezzanine levels. The assessment has however missed queuing for the new cycle store system, which could have significant impact to public space along Bury Court and St Mary Axe North.

- The ‘Internal layout assessment’ is currently carried out in isolation from other assessments. The resulting external queuing space in front of the Pavilion identified, for instance, has not been considered in the public realm and level of service assessments.

4 Summary and Recommendations

4.1 Summary

The Tulip will be a prominent landmark in the City of London. Its visitor attractions, educational facilities, restaurants and cafes will attract patrons from within beyond the City of London. At full capacity, the development will generate over 17,000 journeys a day.

The public realm will also continue to be an important part of the pedestrian route network as well as an area for relaxation used by local workers. For these functions to work in harmony, and to give the City of London confidence, it is recommended that the applicant undertake additional tasks to give improved confidence to the resulting pedestrian conditions:

- Revision to Future Baseline to include 1 Leadenhall Street;
- New scenario with an additional 10% uplift as a future proofing sensitivity test;
- Comparative review of behaviours and profile of visitors to The View from the Shard and Sky Garden at 20 Fenchurch Street;
- An audit of the use and occupancy of public space at different parts of the site;
- A capacity assessment for the cycle store system and its implication on waiting and queuing in public space; and
- In addition, the City of London may wish to secure conditions on any planning consent requiring submission and approval of a Queue Management Strategy, incorporating security measures, prior to opening of the development and limiting access to pre-booked ticket holders only.

Subject to the above points being addressed, Arup is content that the proposed development will not result in an unacceptable impact on the wider pedestrian network. However, the City of London should confirm that they are happy with the public realm impacts of the development, given that it reduces the extent of the current open space around the Gherkin.

FAO Ms Bhakti Depala
City of London Corporation
Department of the Built Environment
PO Box 270
Guildhall
London EC2P 2EJ

Date:

RE: Land Adjacent To 20 Bury Street London EC3A 5AX Planning Application No 18/01213/FULEIA

Dear Ms Bhakti Depala,

I am writing to register my support for the proposals for The Tulip at the land Adjacent To 20 Bury Street London EC3A 5AX which will include the following benefits:

- A world-class visitor attraction for London bringing 1.2 million visitors per year, consistent with the City of London’s Culture Mile initiative and the desire to build public engagement within the City.
- An elegant design that complements the iconic Gherkin and makes a positive architectural contribution to the London skyline.
- The Tulip and The Gherkin will bring life to the City at all times of the day and evening, seven days a week. This creates opportunities for a diverse range of businesses to operate out-of-office hours, bringing real economic and social benefits for the local community and for London.
- Delivery of high quality public realm, including a new rooftop terrace and street level ‘pocket park’ providing new landscaped amenity space for local workers, visitors and residents.
- Creation of new and substantially improved pedestrian routes adding to permeability in the immediate area.
- Generation of 460 full time jobs per year during construction and 600 additional permanent full time jobs during 20 years of operations.
- Provision of an education facility within the top of The Tulip, offering 360⁰ views and three classrooms. It will enable every inner London state school child between the age of 5-16 years of age to visit the facility free of charge during their school career.

I think the proposals will further enrich the City and Greater London. I hope that councillors will consider these points when making their decision.

Kind regards

Name:.....

Signature:.....

Address:.....

.....

.....

Postcode.....

Date:

Dear Sir / Madam,

RE: Land Adjacent To 20 Bury Street London EC3A 5AX Planning Application No 18/01213/FULEIA

Thank you for signing a letter of support for the above planning application. The letter will be forwarded to the relevant local authority so that they can take the letter into account when deciding upon this planning application. A copy of this letter will be held by Cicero and the applicant in accordance with GDPR and the Data Protection Act.

Cicero is a community consultation company which carries out consultation throughout the UK. If you would like to discuss any aspects of this application further, please contact us on 0800 433 2622.

Alternatively you can contact us by email at [REDACTED]

[REDACTED]

Raj Mandair
Cicero

Date:

Dear Sir / Madam,

RE: Land Adjacent To 20 Bury Street London EC3A 5AX Planning Application No 18/01213/FULEIA

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Alternatively you can contact us by email at [REDACTED]

[REDACTED]

Raj Mandair
Cicero

From: [Depala, Bhakti](#)
To: [REDACTED]
Cc: [PLN - Comments](#)
Subject: FW: GLA/4868: 20 Bury Street
Date: 21 March 2019 12:20:57

From: Simon Westmorland [REDACTED]
Sent: 21 March 2019 10:08
To: Depala, Bhakti [REDACTED]
Cc: Horkan, David [REDACTED]; Katherine Wood
[REDACTED]
Subject: GLA/4868: 20 Bury Street

Dear Bhakti

Please see below an updated GLA officer comment in relation to amendments/further information received for the application at Land adjacent to 20 Bury Street (GLA/4868). Please could these comments be reported to committee.

Many thanks

Simon

GLA officer update

On 8 February 2019, the applicant provided an updated floor plan to the City of London for Level 3 of the of the bulb element of the proposals (Dwg. No. A-PT-031-03-01 rev 02). As per the initial application drawings, level 3 was to provide an 88 sq.m. classroom plus associated ancillary space along with back of house/plant space. The alterations to level 3 would now see approximately 168 sq.m. provided for classrooms along with associated ancillary space. It is understood that it is now possible to accommodate the plant/back of house space at Levels 1 and 2.

The Stage 1 report (GLA/4868/01) discussed the heritage impacts of the proposals and noted the high degree of harm to the setting of the Tower of London World Heritage Site, a heritage asset of the highest significance, and the Grade I listed St Botolph's Church. Paragraph 67 of the above mentioned report noted that, in accordance with the provisions of the NPPF, this harm should be weighed against the public benefits of the proposals and that, *"Given that the harm relates to a [World Heritage Site], a heritage asset of the highest significance, the weight applied to its conservation, and any harm to its significance, should be very high."* Furthermore, paragraph 68 of the report noted that, *"the negligible level of public benefit [arising from the proposals] falls substantially short of anything appropriate and the proposals would therefore fail to accord with the provisions of the NPPF."*

Having regard to the above, while it is noted that the amendments to Level 3 would result in an increase in educational floorspace, this increase would be small in absolute terms and the conclusions of the Stage 1 report with respect to the assessment of harm to heritage assets remain unchanged. Specifically, it is restated by GLA officers that the public benefits of the proposals would fall substantially short of anything appropriate and the proposals would fail to

accord with the provisions of the NPPF.

Further to the above, it is noted that the covering letter submitted with the amended drawing (dated 8 February 2019), along with the original application documentation, refers to the percentage of overall floorspace within the proposals that would be dedicated to this educational space (noted as 8.34% within the covering letter). The letter specifically notes that percentage of floorspace afforded to the educational space is greater than the percentage afforded to free to enter publicly accessible spaces within other tall buildings in the eastern cluster of the City of London. It is noted by GLA officers that when attaching weight to the public benefit associated with this educational floorspace, any weight should be based on the absolute level of floorspace provided and not on any relative/percentage figure. It is therefore considered inappropriate to express the education space in percentage terms of the overall building and, given its minimal amount in absolute terms, any weight afforded to this space should be minimal and would not constitute sufficient public benefit to outweigh the identified harm to heritage assets.

In response to transport comments made at Stage 1, TfL was sent a 'Response to GLA Stage 1 Report' on 19 February 2019 by the applicant's transport consultants Steer. It notes that the amount of public space left over at ground level if the proposed development is constructed would decrease by at least 4%. Furthermore, even if The Tulip is not constructed, pedestrian flows at 6 key locations for pedestrian movement in the surrounding streets will increase by on average 42% due to population growth, other developments already consented nearby, and the future opening of the Elizabeth Line (Crossrail).

Due to the growth in pedestrian crowding already expected around the site at St Mary Axe, Undershaft, Bury Street and Cunard Place, reducing the amount of public space around the existing Gherkin building is totally unacceptable and would be contrary to both the London Plan and draft London Plan. It is not accepted that the development would improve or support active travel or public transport in the vicinity. Nor is it considered that the proposals would reflect or deliver any benefits against the TfL 'Healthy Streets' indicators and approach, or the Mayor's 'Vision Zero' objective for there to be no deaths or serious injuries on London's streets and roads by 2041.

Simon Westmorland

Senior Strategic Planner
GREATERLONDONAUTHORITY
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[london.gov.uk](https://www.london.gov.uk)


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